EPA REGISTRATION NUMBER 42750-197

ISB'S Front-end PRIA Completeness Screen Draft 3; 10/25/07

EPA	Receipt Date: APR 1 6 2008	EPA Reg. Number:	4275	TO - M	01
	Check List Iten	i	Yes	No	N/A
1	Has the PRIA Fee been Paid ; is a cop Pay.gov receipt included in the Submis	X	M		
2	Is an Application Form (EPA Form 8 Submission Package, is it completely to including package type?	X			
3	Is a Confidential Statement of Form 29) Included in the Submission Package filled out and signed (boxes 1-21)?	X			
4	Is a Formulator's Exemption Statem 27) Included in the Submission Packag		メ		
5	Is a Certification with Respect to Cit Form 8570-34) Included in the Submis	*		-	
6	Is a Data Matrix (EPA Form 8570-35) Included in the Submission Package?				
7	Is a Label Included in the Submission Package?				
8	Are Data Included in the Submission	X			
9	Is the Submission an Amendment?			X	

Material to be added to an e-Jacket/Jacket

Re	g. No. <u>4</u>	2750-1617	Decision #	450640
) De:	scription:	acceptable 2007-4	notificution	
1.	Placemen	t within the e-Jacket/jack	ket:	· · · · · · · · · · · · · · · · · · ·
	这	Default: (chronological,	top = newest)	
		File Location: (eg. "befo	ore page 45 in .pdf")	
2.	☐ Send to I	Data Extraction contracto ☐ Newly stamped acce ☑ Notification		
		☐ New CSF		
		☐ Other:		
3.	organized a	coversheet to the top of the common to the c	STAPLED. Then	give the material with
	Reviewer:	Maggie Rudick	Divisio	n: RD
	Phone:	703-347-0257	Date	e: 06/ 17 /2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Morris Gaskins Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604-2127

JUN 17 2011

Subject: Notification per PR Notice 2007-4: Update Container Disposal Instructions

Clopyralid Technical Herbicide and Triclopyr TGAI III

EPA Reg. No. 42750-184 and 42750-197

Application Dated: June 7, 2011

Dear Mr. Gaskins:

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice 2007-4 for the subject products.

The Registration Division (RD) has conducted a review of these requests for applicability under PRN 2007-4 and finds that the actions requested fall within the scope of this notice. The labels submitted with the application have been date-stamped "Notification" and will be placed in our records.

If you have any questions regarding this letter, please feel free to contact Maggie Rudick at (703) 347-0257 or rudick.maggie@epa.gov.

Sincerely,

Kable Bo Davis, Product Manager 25

Herbicide Branch

Registration Division (7505P)

Please read instructions	on reverse before comp	leting form.		Form Ap	proved.	OMB No.	2070-0060	D. Approval expires 2-28-
United States Environmental Protection Washington, DC 20460			•		F	Registration Amendment ✓ Other		OPP Identifier Number
		Application	for Pesti	cide - Sec	tion I		· · · · · · · · · · · · · · · · · · ·	
1. Company/Product Nu 42750-197	mber		ı	A Product Man Bo Davis	ager			oposed Classification
4. Company/Product (Name) Triclopyr TGAI III				PM# 25				
5. Name and Address o	f Applicant (Include ZIP (Code)	6. E	spedited Rev	eiw. I	n accord:	ance with	FIFRA Section 3(c)(3)
Albaugh Inc. P.O. Box 2127 Valdosta, GA 316			(b)(i) to:		s simila	ar or iden	tical in cor	mposition and labeling
Check it	f this is a new address			duct Name _				
			Section	- 11				
Amendment - Ex ✓ Resubmission in Notification - Exp	response to Agency lette	or dated <u>1/15/</u>	<u>′09</u>	Final printed Agency lett "Me Too" A Other - Expl	er dated pplication	on.	TIFICAT	
This notification is consist requirements of EPA's reconfidential statement of understand that if the an	se Container Disposal instr stent with the provisions of egulations at 40 CFR 156.1 formula of this product. I nended label is not consiste enforcement action and pe	PR Notice 2007-4. 10, 156.140, 156.144 understand that it is ent with 40 CFR 156 nalties under section	This notification 4, 156.146, and a violation of 5.10, 156.140,	on is consistent v d 156.156. No d 18 U.S.C. Sec. 1 156.144, 156.14 FIFRA.	vith the g other cha 001 to w	guidance ir inges have villfully mak	PR Notice : been made e any false	2007-4 and the
1. Material This Product	Will Be Packaged In:						· · · · · · · · · · · · · · · · · ·	
Child-Resistant Packagin Yes ✓ No * Certification must be submitted	Yes No	No. per	Water Soluble Yes ✓ No f "Yes" Package wgt	No. per container	2	2. Type of	Container Metal Plastic Glass Paper Other (Sp	pecify)
3. Location of Net Conte	nts Information Container	4. Size(s) Retail C	Container	1 4	5. Locat	tion of Lat	pel Direction	18
6. Manner in Which Labe		Lithograph Paper glue Stenciled	ı əd	Other				
			Section -	IV				<u> </u>
1. Contact Point (Comp.	lete items directly below				f necess	sary, to pr	ocess this a	application.)
Name Title Morris Gaskins Registra			_	rations Manager		Telephone No. ('r.c'ude Area Code) 229-244-3288		
	tatements I have made or t any knowlinglly false or ble law.		attachments t				nplete.	6. Date Application Received (S≀amped)
2. Signature	In Des	3. T	itie gistrations Ma	nager				
4. Typed Name 5. Date Morris Gaskins				ne 7, 2011		·		

CORPORATE OFFICE 1525 NE 36th Street Ankeny, IA 50021 515.964.9444 (Phone) 800.247.8013 (Toli Free) 515.964.7813 (FAX)

ALBAUGH, INIC.

GEORGIA OFFICE P.O. Box 2127 Valdosta, GA 31604-2127 229.244.3288 (Phone) 229.244.5841 (FAX)

Fed-X

June 7, 2011

Document Processing Desk (NOTIFY) Mr. Bo Davis (PM 25) Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202-4501

RE: PR Notice 2007-4 Container Disposal

Dear Mr. Davis,

The enclosed submissions for the below referenced registrations are label notifications in response to the Agency's PR Notice 2007-4 for Container Disposal revision.

PRODUCT	EPA REG. NO.
Triclopyr Acid II	42750-191
Triclopyr Acid III	42750-197
Clopyralid Technical Herbicide	42750-184
Glyphosate Acid Technical	42750-56
Glyphosate Acid TGAI	42750-170
Glyphosate Acid TGAI	46146-6
Trifluralin Technical	46146-2

Please note that the Container Disposal statements for the clopyralid and triclopyr products are the same as ones previously approved by EPA for similar Albaugh registrations. We are using the same language for the glyphosate technicals because they are received in the same plastic lined bulk tote bags. The trifluralin product has similar packaging (un-lined open mouth metal drum) as our previously approved Bromoxynil Technical.

Three copies of the draft label with changes noted with strikeout/bold text are enclosed. The PRN certification statement is listed on the 8570-1 forms.

Please call if you have any questions.

Regards,

Morris Gaskins

Registrations Manager, Albaugh, Inc. US Regulatory Agent, Atanor S.A

TRICLOPYR TGAI III

ACTIVE INGREDIENT:	
3,5,6-trichloro-2-pyridyloxyacetic acid	98.0%
INERT INGREDIENTS:	
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

NOTIFICATION
JUN 1 7 2011

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

EMERGENCY NUMBERS: Transportation or spill, call CHEMTREC 800-424-9300.

EPA Reg. No. 42750-197

EPA Est. No. xxxxx-xxx-xxx

NET CONTENTS:

Manufactured For: ALBAUGH, INC. ANKENY, IA 50021

PRECAUTIONARY STATEMENTS,

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Wear long-sleeved shirt and long pants, protective eyewear, socks, shoes, and gloves. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

NOTICE: Read the entire label. Use only according to label directions. Before buying or using this product, read WARRANTY LIMITATIONS AND DISCLAIMER elsewhere on this label.

AGRICULTURAL CHEMICAL - Do not ship or store with food, feeds, drugs or clothing

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may be used to manufacture products that:

- 1. Contain triclopyr butoxyethyl ester (BEE) for use on rangeland, permanent pastures, forestry, turf, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, fence rows, industrial sites and conservation reserve program (CRP) areas.
- 2. Contain triclopyr triethylanolamine (TEA) for use on rangeland, permanent pastures, forestry, turf, Christmas tree plantations, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, rice, fencerows, industrial sites and conservation reserve program (CRP) areas.
- 3. Specific uses not listed on the MP label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such uses.

NOTE: Because of their properties and intended uses, formulations containing TRICLOPYR 98% TECHNICAL ACID may require precautionary labeling differing from that given on this label. Formulators should develop their own use and precautionary labeling based on the properties and intended uses of their own formulations and in accordance with all pertinent laws and regulations.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 28 F away from moisture.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes "cannot be disposed or by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

CONTAINER DISPOSAL: Non-refillable container. DO NOT reuse or refill this container.

Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. If not emptied in this manner, the liner may be considered an acute hazardous waste and disposed in accordance with local, state and federal regulations.

When completely empty, offer for recycling, if available, or dispose of liner in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. If drum or other outer container is contaminated and cannot be reused, dispose of in the manner required for its liner.

GENERAL: Consult Federal, state or local disposal authorities for approved alternative procedures.

WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTEES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.



U.S. ENVIRONMENTAL PROTECTION **AGENCY**

Office of Pesticide Programs Registration Division (7505P) Ariel Rios Building 1200 Pennsylvania Ave., NW Washington, D.C. 20460

EPA Reg. Number	
42750-197	

Date of Issuance:

NOV

3 2008

NOTICE OF PESTICIDE:

x Registration

Reregistration (under FIFRA, as amended) Term of Issuance: Conditional

Name of Pesticide Product:

TRICLOPYR TGAI III

Name and Address of Registrant (include ZIP Code):

Mr. Morris Gaskins

Albaugh Inc.

P.O. Box 2127

Valdosta, GA 31604

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

- 1. Submit and/or cite all data required for registration/reregistration review of your product when the Agency requires all registrants of similar products to submit data.
 - 2. Submit the data listed below:

a. Submit data for one year storage stability (830.6317) and corrosion characteristics (830.6320). The one year storage stability study and corrosion characteristics studies must be conducted with TRICLOPYR TGAI III under full GLP requirements. It is recommended that the observations be made at intervals of 0 (initial), 3 month, 6 month, 9 month, and 12 month intervals.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

If you have any questions about this notice, you may contact Tobi Colvin-Snyder at 703-305-7801 or Colvin-Snyder.Tobi@epa.gov.

Signature of Approving Official:

Jim Tompkins

Product Manager 25

Herbicide Branch

Registration Division (7505P)

11-3-08

EPA Form 8570-6

TRICLOPYR TGAI III

ACTIVE INGREDIENT:	
3,5,6-trichloro-2-pyridyloxyacetic acid	98.0%
INERT INGREDIENTS:	2.0%
TOTAL:	.00.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

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EMERGENCY NUMBERS: Transportation or spill, call CHEMTREC 800-424-9300.

EPA Reg. No. 42750-ROT

EPA Est. No. Xxxxxx-xxx

NET CONTENTS:

Manufactured For: ALBAUGH, INC. ANKENY, IA 50021

ACCEPTED
with COMMENTS
In EPA Letter Dated

NOV 3 2008

Under the Federal Insecticide, Fundicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

PRECAUTIONARY STATEMENTS,

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Wear long-sleeved shirt and long pants, protective eyewear, socks, shoes, and gloves. Remove and wash contaminated clothing before reuse.

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- 2. Contain triclopyr triethylanolamine (TEA) for use on rangeland, permanent pastures, forestry, turf, Christmas tree plantations, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, rice, fencerows, industrial sites and conservation reserve program (CRP) areas.
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NOTE: Because of their properties and intended uses, formulations containing TRICLOPYR 98% TECHNICAL ACID may require precautionary labeling differing from that given on this label. Formulators should develop their own use and precautionary labeling based on the properties and intended uses of their own formulations and in accordance with all pertinent laws and regulations.

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PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes "cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

GENERAL: Consult Federal, state or local disposal authorities for approved alternative procedures.

WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTEES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

Material to be added to an e-Jacket/Jacket

Reg. No. 42750-197

□ De	nent within the e-Jacket/jacket: efault: (chronological, top/newest) escription: (PDF page number, i.e., "before page 5")
2. Send t	Notification New CSF
3. Attach thi must be wel Then give th	s coversheet to the top of the material or jacket. It I organized and clipped together, NOT STAPLED. he material with this coversheet to staff in the Services Center (Room S-4900).
Reviewer	's Name: Tobi Colvin-Snyder
	03-305-7801 Division: RD 2-2-08

DATA PACKAGE BEAN SHEET

Date: 16-Jun-2008

Page 1 of 2

Decision #: 392284

DP #: (353704)

PRIA

Parent DP #:

Submission #: 827807

	***B	egistration Inf	ormation * *	* Su i	01111551011 #. 0270	U1		
Registration:	42750-ROT - TRICLOP	YR TGAI III			- (1/310			
Company:	42750 - ALBAUGH INC				_ (~ ~		
Risk Manager:	RM 25 - James Tompkins - (7	123	3580					
Risk Manager Reviewer:	Tobi Colvin-Snyder TSNYDE	R						
Sent Date:	17-Apr-2008	Calculated Due Da	te: <u>03-Nov-2008</u>	Edited	Due Date:			
Type of Registration:	Type of Registration: Product Registration - Section 3							
Action Desc:	(R310) NEW PRODUCT;NO	N-FAST TRACK (INCL	UDES REVIEWS (OF PRODUCT CHEMIS	S1			
Ingredients:								
		ata Package In		* *				
Expedite:	Yes No	Yes ● No Date Sent: 16-Jun-2008			Due Back:			
DP Ingredient:								
DP Title:	Product Chemistry Review				_			
CSF Included:	Yes No Labo	el Included: Yes	No Parer	nt DP #:				
Assigned T	<u>o</u> _	Date In	Date Out					
Organization: RD /	гяв			Last Possible Science	Due Date: 04-Oct-2008	3		
Team Name:	DEM-				Due Date:			
Reviewer Name:	Sub Data Package	Due Date:						
Contractor Name:								
	* * * Stud	dies Sent for F	Review * * *					
		Printed on Page 2	•					

Printed on Page 2

* * * Additional Data Package for this Decision * * *

No Additional Data Packages

* * * Data Package Instructions * * *

Please see DP#353539

DP BARCODE: D353704; FILE SYMBOL No.: 42750-ROT; PRODUCT: Triclopyr TGAI III

Date: September 10, 2008

SUBJECT: Product Chemistry Review of Triclopyr TGAI III / MUP

FROM: Shyam B. Mathur, PhD

Product Chemistry Team Leader

Technical Review Branch/RD (7505P)

TO: Tobi Colvin-Snyder / James Tompkins, RM 25

Herbicide Branch / RD (7505P)

DP BARCODE: D353704 DECISION No.: 392284 File Symbol No.: 42750-ROT

PRODUCT: Triclopyr TGAI III / MUP

PCC: 116001

REGISTRANT: Albaugh Incorporation

USE: Herbicide FOOD USE: No

INTRODUCTION:

The registrant, Albaugh Incorporation, has submitted a registration application for the triclopyr TGAI III /MUP. The triclopyr TGAI III / MUP is produced by support of the application, the registrant has submitted 830 series group A data with MRID Nos. 474034-01 and 474034-02, a CSF for basic formulation (dated 04-14-08) and the product label. The registrant has not submitted but cited the group B data (physical-chemical properties). The registrant has claimed that the proposed triclopyr TGAI III / MUP is substantially similar to Albaugh's Triclopyr TGAI with Reg. No. 42750-123 (). TRB has been asked to evaluate the product chemistry data submitted and determine its similarity to the registered technical product.

SUMMARY OF FINDINGS:

- 1. The registrant has submitted a basic formulation CSF (dated 04-14-08) for triclopyr TGAI III /MUP. The average purity of the active ingredient in TGAI/MUP is 98.0%, as determined by the five batch analysis. The proposed certified limits for the AI are based on the standard certified limits as set forth in 40CFR\$158.350(b)(2). The proposed limits for impurities > 0.1% are based on the preliminary analysis and expected to occur in normal commercial production. The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) satisfy the data requirements of 40CFR\$158.320 and 158.350 respectively [MRID No. 474034-02].
- 2. The product chemistry data submitted corresponding to guideline reference 830.1600 (description of material used to produce the product) satisfy the data requirements of 40CFR§ 158.325 [MRID No. 474034-02].

'Product ingredient source information may be entitled to confidential treatment'

DP BARCODE: D353704; FILE SYMBOL No.: 42750-ROT; PRODUCT: Triclopyr TGAI III

- 3. The product chemistry data submitted corresponding to guideline reference 830.1620 (description of production process) satisfy the data requirements for 40CFR§158.330. The triclopyr TGAI III / mup was produced by
- of the final product. The applicant has provided the details of the chemical process with reaction conditions, equipment used, working up procedures, and quality assurance steps [MRID No. 474034-02].
- 4. The product chemistry data submitted corresponding to guideline reference 830.1670 (discussion on the formation of impurities) satisfy the data requirements for 40CFR§158.340. During the production of triclopyr tgai III /mup, the registrant discussed the formation of one major impurity present at the concentration of >0.1%. No other impurities were reported during the 5 batch analysis. The registrant has stated that there is no possibility of the formation of impurities of toxicological concern as there are no preexisting conditions or starting materials present in the production process which are required for their formation [MRID No. 474034-02].
- 5. The data submitted corresponding the guideline reference 830.1700 (preliminary analysis) satisfy the data requirements of 40CFR§158.345. The study was conducted under GLP requirements in compliance with 40CFR§160. The analysis study was performed by *eurofins / Product Safety Laboratories, Dayton, NJ, USA*. Five representative batches of the triclopyr tgai III / mup () were analyzed for percent active ingredient and the impurities. The identification & quantification of the AI and impurities were performed by combination of HPLC-UV (290nm) with external standard quantification. The analytical methods utilized a Supelco Ascentis RP-Amide column, 250 x 4.6 mm x 5 µm. The analytical methods were validated for accuracy, linearity, and precision [MRID Nos. 474034-01].
- 6. The data submitted corresponding the guideline reference 830.1800 (enforcement analytical method) satisfy the data requirements of 40CFR§158.355. The purity of the AI in the TGAI was determined by HPLC-UV (290 nm) by external standard method. The method was validated for precision, accuracy and linearity [MRID Nos. 474034-02].
- 7. The data cited corresponding to guidelines 830.6302 (color), 830.6303 (physical state), 830.6304 (odor), 830.6313 (stability to normal & elevated temperature, metal & metal ions), 830.7000 (pH), 830.7050 (UV/VIS), 830.7300 (density), 830.7220 (boiling point), 830.7550-7570 (partition coefficient), 830.7840-7860 (water solubility), 830.6314 (oxidation/reduction), 830.6315 (flammability), and 830.7950 (vapor pressure)satisfy the data requirements of 40CFR§158.310 (e) [cited MRID No. 466195-04].

DP BARCODE: D353704; FILE SYMBOL No.: 42750-ROT; PRODUCT: Triclopyr TGAI III

CONCLUSIONS:

The TRB has reviewed the product chemistry data submitted for triclopyr TGAI III / MUP () and has concluded that:



- 1. All the product chemistry data submitted & cited corresponding to the guidelines 830 Series group A and group B are acceptable.
- 2. The proposed CSF for basic formulation (dated 04-14-08) is acceptable. No new impurities are listed in the proposed CSF. There is only one impurity reported in the CSF which is also present in the cited product.
- 3. The data cited corresponding to guidelines 830.6302 (color), 830.6303 (physical state), 830.6304 (odor), 830.6313 (stability to normal & elevated temperature, metal & metal ions), 830.7000 (pH), 830.7050 (UV/VIS), 830.7300 (density), 830.7220 (boiling point), 830.7550-7570 (partition coefficient), 830.7840-7860 (water solubility), 830.6314 (oxidation/reduction), 830.6315 (flammability), and 830.7950 (vapor pressure) satisfy the data requirements of 40CFR§158.310 (e) and are acceptable.
- 4. The registrant must either cite or submit data for the guidelines 830.6317 (one year storage stability), and 830.6320 (corrosion characteristics). The registrant can also request waivers for the guidelines with proper scientific justifications.
- 5. The registrant must conduct the one year storage stability (830.6317) and corrosion characteristics (830.6320) for the proposed triclopyr tgai III / mup under full GLP requirements. It is recommended that the observations should be made at the intervals of 0 (initial), 3 month, 6 month, 9 month, and 12 month (final). The results must be submitted to the Agency on completion.
- 6. The proposed product with File Symbol No. 42750-ROT was determined to be substantially similar to the registered product with Reg. No. 42750-123 from product chemistry point of view.

DP BARCODE: D353704; FILE SYMBOL No.: 42750-ROT; PRODUCT: Triclopyr TGAL III

830.1550. Product identity & Composition: (MRID No. 474034-02)

Common Name: Triclopyr acid

Chemical name (IUPAC): 3, 5, 6-trichloro-2-pyridyloxyacetic acid

(CAS) : [(3, 5, 6-trichloro-2-pyridinyl)oxy]acetic acid

CAS No.: 55335-06-3

PC Code No.: 116002

Empirical formula: C₇H₄Cl₃NO₃

Molecular Weight: 256.5

Structural formula:

DP BARCODE: <u>D353704</u>; FILE SYMBOL No.: <u>42750-ROT</u>; PRODUCT: <u>Triclopyr TGAI III</u>

GLN	Requirement	MRID	Status	Details and /or Deficiency
830.1550	Product Identity and composition	Basic CSF (04-14-08)	A	The NC of AI (98.0%) is supported by 5 batch analysis & agrees with the label claim nominal concentration. Only impurity is listed on the CSF.
8301600	Description of materials used to produce the product	474034-02	A	The description & composition for all the starting materials used to produce the triclopyr technical III have been provided by the registrant
830.1620	Description of production process	474034-02	А	The AI was produced The production process has been described in full details.
830.1670	Discussion of formation of impurities	474034-02	A	The registrant has provided the complete mechanisms of formation, quantification and identification of all the impurities present at the levels of ≥ 0.1%. No impurity of tox concern was reported.
830.1700	Preliminary analysis	474034-01	A	Five representative batches of triclopyr TGAI III () were analyzed for percent active ingredient and the impurities. The identification & quantification of the AI and the impurities in the TGAI were determined by HPLC-UV (290 nm) with external standard method. The five batch analysis supported the proposed CSF for basic formulation.
830.1750	Certified limits	474034-02	A	The proposed certified limits for the AI are based on standard certified limit table, whereas, those of impurities are based on five batch analysis.
830.1800	Enforcement analytical method	474034-02	Α	The HPLC-UV (290 nm) with external standard method was used for the determination of the AI content in the TGAI/MUP. The method was validated for precision, linearity and accuracy

⁵

DP BARCODE: D353704; FILE SYMBOL No.: 42750-ROT; PRODUCT: Triclopyr TGAI III

Cited 830 Series group B (Physical-Chemical Properties)

GLN	Requirement	MRID	Status	Result or Deficiency			
830.6302	Color	466195-04	Α	White			
830.6303	Physical state	u u u	Α	Solid (powder)			
830.6304	Odor	cc es cs	А	Practically odorless			
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	и и и	А	Stable at RT & 54°C & RT for 14 days. No reaction with Fe powder, Fe acetate, Al powder & Al acetate at RT & 54°C.			
830.6314	Oxidation/reduction: chemical incompatibility		NA				
830.6315	Flammability		NA	100°C			
830.6316	Explodability		NA				
830.6317	Storage stability		G				
830.6319	Miscibility		NA				
830.6320	Corrosion characteristics		G				
830.7000	pН	466195-04	А	3.22			
830.7050	UV/Visible absorption		А	Note 1			
830.7100	Viscosity		NA				
830.7200	Melting point	466195-04	Α	151°C			
830.7220	Boiling point		NA				
830.7300	Density Pour	466195-04	A	0.254 ± 0.004 g/ml			
	Тар			0.483 ± 0.002 g/ml			
830.7370	Dissociation constants in water (DC)	u u u	A	3.442 ± 0.020			
830.7550	Partition coefficient	466195-06	Α	Log Po/w = 0.807 ± 0.062			
830.7840	Water solubility:	466195-04	Α	0.38 <u>+</u> 0.01 g/L (mean)			
830.7950	Vapor pressure	466295-05	A	3.2 x 10 ⁻⁵ Pa @ 25°C			

 $A = Acceptable; \ N = unacceptable \ (see \ Deficiency); \ N/A = Not \ Applicable; \ G = Data \ gap; \ I = In \ progress \ or \ need \ upgrade; \ U = Upgrade \ (additional \ information \ required); \ TBA = To \ Be \ Assigned$

DP BARCODE: <u>D353704</u>; FILE SYMBOL No.: <u>42750-ROT</u>; PRODUCT: <u>Triclopyr TGAI III</u>

Note1. 830.7050 (UV/VIS): (MRID No. 466195-04)

Medium	Wavelength (nm)	ε value calculated	
Neutral	232	11782.6	
	295	7554.6	
Acidic	231	11274.8	
	294	7275.3	
Alkaline	233	12328.6	
	297	7707.0	

DP BARCODE: D353704; FILE SYMBOL No.: 42750-ROT; PRODUCT: Triclopyr TGAI III

830.1800. Enforcement of analytical method: (MRID No. 474034-02)

Determination of Al

The five batches of NUP-07135 were assayed by a validated analytical method based on high performance liquid chromatography (HPLC) employing an external standard technique with ultraviolet (UV) detection.

The following conditions were used.

Instrument:

Thermo LQC

Column:

Supelco Ascentis RP-Amide, 5 µm, 250 x 4.6 mm

Column temperature:

off

Mobile phase

Acidified water (pH 2.9)/Acetonitrile//40/60

Flow rate:

1.0 mL/min

Injection volume:

5 ul

Detector:

UV

Wavelength

290 nm

Run Time:

15.0 min.

Retention time observed for Triclopyr acid:

7.2-7.6 minutes

STANDARD PREPARATION

Stock solutions were prepared by accurately weighing an appropriate amount of reference standard into a 50 mL volumetric flask, diluting to volume with acetonitrile, and mixing well. Dilutions of 1/10 of the stock solutions were performed using mobile phase and mixing the solutions well.

SAMPLE PREPARATION

Approximately 0.05 gram aliquots of each batch of the test substance were accurately weighed into separate 50 mL volumetric flasks, diluted to volume with acetonitrile, and mixed well. Dilutions of 1/10 of the stock solutions were performed mobile phase and mixing the solution well. Each batch was prepared in duplicate, and each preparation was injected in duplicate

ANALYSIS

At the beginning of the analysis, the instrument was equilibrated until a stable, consistent baseline was obtained. The standards and samples were injected at consistent time intervals in order to maintain a steady baseline. A solvent blank and standards were run; all samples were injected in duplicate. Following up to four sample injections, standard preparations were run to confirm system stability and calibration. The sample purities were calculated using the standards bracketing every four sample solutions

DP BARCODE: D353704; FILE SYMBOL No.: 42750-ROT; PRODUCT: Triclopyr TGAI III

From the data obtained by the analytical method, the purity of each sample of Triclopyr (technical grade) was calculated by reference to the calibration curve.

Calculation:

% Assay = Sample Pk Area/Avg Response of the Std x % Purity of Std Sample Conc (μ g/mL)

where: Avg Response of the Std = Avg [Std Pk Area/Std Conc (μg/mL)]

METHOD VALIDATION

The method was validated as reported in the preliminary analysis study, Eurofins PSL Laboratories Laboratory Study # 24024.

Detector Linearity

Prior to analysis, detector response linearity was confirmed using test substance solutions targeted to bracket the expected concentration for optimum product analysis. Stock solutions were prepared by accurately weighing appropriate amounts of one batch of the test substance into separate 50 mL volumetric flasks, diluting to volume with acetonitrile, and mixing well. Dilutions of 1/10 of the stock solutions were performed using mobile phase and mixing the solution well. Linear regression of the major peak gave a coefficient of determination (r²) of 0.9986 and was considered to be acceptable.

Precision

Chromatography of four replicate injections of the midpoint linearity solution produced a relative standard deviation for this study of 0.96%.

 $\textbf{DP BARCODE: } \underline{D353704}; \textbf{ FILE SYMBOL No.} : \underline{42750\text{-}ROT}; \textbf{PRODUCT} : \underline{Triclopyr TGAI III}$

DP BARCODE: D353704; FILE SYMBOL No.: 42750-ROT; PRODUCT: Triclopyr TGAI III

CONFIDENTIAL APPENDIX		

DP BARCODE: <u>D353704</u>; FILE SYMBOL No.: <u>42750-ROT</u>; PRODUCT: <u>Triclopyr TGAI III</u>

DP BARCODE: <u>D353704</u>; FILE SYMBOL No.: <u>42750-ROT</u>; PRODUCT: <u>Triclopyr TGAI III</u>

Manufacturing process information may be entitled to confidential treatment

DP BARCODE: <u>D353704</u>; FILE SYMBOL No.: <u>42750-ROT</u>; PRODUCT: <u>Triclopyr TGAI III</u>

DP BARCODE: <u>D353704</u>; FILE SYMBOL No.: <u>42750-ROT</u>; PRODUCT: <u>Triclopyr TGAI III</u>

DP BARCODE: <u>D353704</u>; FILE SYMBOL No.: <u>42750-ROT</u>; PRODUCT: <u>Triclopyr TGAI III</u>

DATA PACKAGE BEAN SHEET

Date: 16-Jun-2008

Page 1 of 2

Decision #: 392284

DP #: (353706)

PRIA

Parent DP #:

* * * Registration Information * * *

Submission #: 827807

Registration:	42750-ROT - TR	ICLOPYR TGAI III	mar constru		(1) 31	\bigcirc	
Company:	any: 42750 - ALBAUGH INC					_	
Risk Manager:	RM 25 - James Tom		1	12585			
Risk Manager Reviewer:	k Manager Reviewer: Tobi Colvin-Snyder TSNYDER						
Sent Date:	17-Apr-2008	Calculated Due Dat	e: <u>03-Nov-2008</u>	Edited Due	Date:		
Type of Registration:	Product Registration	- Section 3					
Action Desc:	(R310) NEW PRODU	UCT;NON-FAST TRACK (INCL	JDES REVIEWS (OF PRODUCT CHEMIST			
Ingredients:							
						Wagner	
	*	* * Data Package In	formation *	* *			
Expedite:	◯ Yes ● No	Date Ser	nt: <u>16-Jun-2008</u>	Due	Back:		
DP Ingredient:							
DP Title:	Acute Toxicology Sir	milarity Determination					
CSF Included:	● Yes ○ No	Label Included: Yes	No Parer	nt DP #:			
Assigned T	'o_	Date In	Date Out				
Organization: RD / 1	rrb)			Last Possible Science Due	Date: 04-Oct-2	2008	
Team Name:	- ,				Date:		
Reviewer Name:	•				Date:		
	* *	* Studies Sent for R	eview * * *				
		No Studies					
	* * * Additio	nal Data Package fo	r this Decis	ion * * *			
		Printed on Page 2					
	* * *	Data Package Instru	uctions * * *				
Please see DP#35370				Jo Jo)		

Page 2

DP#: (35370	6)	* * * Additio	r⊾ ∠ata Packa	ge for this De	cision * * *		Jecis	sion#: (392284)	
DP#		Division/Branch	Date Sent	Date Due	Instructio	ns?	CSF	fabel	
353704	RD/TRB		16-Jun-2008	04-Oct-2008	Yes	No 🌑	Yes 🔘 No	Yes No	
353704	RD/HB		16-Jun-2008	04-Oct-2008	Yes	No 🌑	Yes 🔘 No	Yes No	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

TECHNICAL REVIEW BRANCH SIMILARITY CLINIC DETERMINATION

23/SEPT/2008

MEMORANDUM

Subject:

Name of Pesticide Product:

Triclopyr TGAI III

DP Barcode:

EPA Reg. No. /File Symbol: 42750-ROT D353706

Decision No:

392284

Action Code:

R310

PC Code:

116001 (triclopyr)

From:

Eugenia McAndrew, Biologist

Eihelendren Marken

Technical Review Branch

Registration Division (7505P)

To:

Tobi Colvin-Snyder, RM Team 25

Herbicide Branch

Registration Division (7505P)

Applicant:

Albaugh, Inc.

1525 NE 36th St.

Ankeny, IA 50021

FORMULATION FROM LABEL:

Active Ingredient(s):

% by wt.

3, 5, 6-trichloro-2-pyridyloxyacetic acid

98.0

Inert Ingredient(s):

2.0

Total:

100.0%

ACTION REQUESTED: The Risk Manager requests similarity determination for 42750-ROT, proposed product, and 42750-123, cited product.

BACKGROUND: Albaugh, Inc. has applied for registration of Triclopyr TGAI III, EPA File Symbol 42750-ROT, claiming similarity to another one of its products, Triclopyr TGAI, EPA Reg. No. 42750-123. Both products are technical grade for manufacturing use only. The Registrant is using the cite-all method of data support to satisfy the acute toxicity data requirements.

A search of the OPP electronic databases shows that the cited product, 42750-123, was assigned an acute toxicity profile in a previous TRB similarity determination (Hashim; D325862; 07/FEB/2006).

RECOMMENDATIONS: TRB has evaluated the formulations of the proposed product, 42750-ROT, and the cited product, 42750-123, and has determined that the two products are substantially similar.

The acute toxicity profile for the proposed product, Triclopyr TGAI III, EPA File Symbol 42750-ROT, is as follows:

acute oral toxicity	III	cited	EPA Reg. No. 42750-123
acute dermal toxicity	IV	cited	EPA Reg. No. 42750-123
acute inhalation toxicity	IV	cited	EPA Reg. No. 42750-123
primary eye irritation	III	cited	EPA Reg. No. 42750-123
primary skin irritation	IV	cited	EPA Reg. No. 42750-123
dermal sensitization	Neg.	cited	EPA Reg. No. 42750-123

The proposed basic CSF dated April 14, 2008 has been accepted by the TRB Product Chemistry Team (Mathur; D353704; 10/SEPT/2008.)

This memorandum pertains only to the decision concerning whether the subject product is similar to the cited product from an acute toxicological view point. For the purposes of this action, TRB has made no further determination of the adequacy of the toxicological data base or the precautionary label of the cited product.

LABELING: Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

PRODUCT ID #:

042750-00197

PRODUCT NAME:

Triclopyr TGAI III

PRECAUTIONARY STATEMENTS

SIGNAL WORD:

CAUTION

Hazards to Humans and Domestic Animals:

Harmful if swallowed. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Avoid contact with eyes or clothing. [Wear protective eyewear.]*

*[Protective eyewear may be specified, if appropriate.]

First Aid:

If swallowed:

- -Call a poison control center or doctor immediately for treatment advice.
- -Have person sip a glass of water if able to swallow.
- -Do not induce vomiting unless told to by a poison control center or doctor.
- -Do not give anything to an unconscious person.

If in eyes:

- -Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- -Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.



TRANSMITTAL DOCUMENT

Name and address of submitter:

Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604-2127

Company Official: Morris Gaskins

Telephone: (229) 244-3288

Regulatory action for which this package is submitted:

Initial application to register Triclopyr TGAI III

Transmittal Date: April 14, 2008

List of items submitted:

Transmittal page

- Cover letter
- 8570-1 application form
- 8570-34 Certification With Respect to Citation of Data form
- 8570-35 Data Matrix (internal use copy)
- 8570-35 Data Matrix (public file copy)
- Draft label (5 copies)
- Basic CSF (2 copies)
- Series 830-A Preliminary Analysis and Enforcement Analytical Methods (OPPTS Guidelines 830.1700 and 830.1800) (3 copies)
- Series 830-A Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities and Certified Limits (OPPTS Guidelines 830.1550, 830.1600, 830.1620, 830.1670 and 830.1750) (3 copies)

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·	DATA MATRIX	
Date: 4/14/08		EPA Reg. No./File Symbol 42750-appl Page 1 of 6
Applicant's/Registrant's Name & Address:	Albaugh Inc. 121 NE 18 th St.	Product: TRICLOPYR TGAI III
	Ankeny, IA 50021	THE CLOTTE TOTAL III

Ingredient: Triclopyr acid CAS # 55335-06-3

Guideline Reference	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	With application	Albaugh	OWN	
830.1600	Description of Materials Used to Produce the	With application	Albaugh	OWN	
830.1620	Description of Product Process	With application	Albaugh	OWN	
830.1650	Description of Formulation Process				Waiver ²
830.1670	Description of Formation of Impurities	With application	Albaugh	OWN	
830.1700	Preliminary Analysis	With application	Albaugh	OWN	
830.1750	Certified Limits	With application	Albaugh	OWN	
830.1800	Enforcement Analytical Method	With application	Albaugh	OWN	
830.6302	Color	46619504	Albaugh	OWN	
830.6303	Physical State	46619504	Albaugh	OWN	
830.6304	Odor	46619504	Albaugh	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	46619504	Albaugh	OWN	
830.6314	Oxidation/Reduction: Chemical Incompatibility				Not req'd1
830.6315	Flammability				Not req'd1
830.6316	Explodability				Not req'd1
830.6317	Storage Stability				Not req'd1
Signature	Mas He		Name and Title: Mor	ris Gaskins Jistrations Manager	Date: 4/14/08

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DATA MATRIX

Date:			EPA Reg. No./File Symbol	42750-appl	Page 2 of 6
Applicant's / Registrant's Name & Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021 Ingredient: Triclopyr acid CAS # 55335-06-3					
Guideline Reference Number	# 55335-06-3 Guideline Study Name	MRID Number	Submitter	Status	Note
830.6319	Miscibility	PIKID NUMBER	Submitter	Status	Not reg'd ¹
830.6320	Corrosion Characteristics				Not req'd1
830.6321	Dielectric Breakdown Voltage			-	Not reg'd1
830.7000	pH	46619504	Albaugh	OWN	
830.7050	UV/Visible Absorption	46619504	Albaugh	OWN	
830.7100	Viscosity				Not req'd1
830.7200	Melting Point/Melting Range	46619504	Albaugh	OWN	
830.7220	Boiling Point/Boiling Range				Waiver ³
830.7300	Density/Relative Density/Bulk Density	46619504	Albaugh	OWN	
830.7370	Dissociation Constants in Water	46619504	Albaugh	OWN	
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	46619506	Albaugh	OWN	
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Waiver ⁴
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Waiver ⁴
Signature		AND	Name and Title: Morris Ga Registrat	askins ions Manager	Date: 4/14/08

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Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, DC 20460

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	DAT/	A MATRIX			
Date:			EPA Reg. No./File Symbol 4275	50-appl	Page 3 of 6
Applicant's/Registrant's Name 8	121 NE 18 th St. Ankeny, IA 50021		Product: TRICLOPYR TGAI I	:II	
Ingredient: Triclopyr acid CAS	# 55335-06-3				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	46619504	Albaugh	OWN	
830.7860	Water Solubility, Generator Column Method				Waiver ⁵
830.7950	Vapor Pressure	46619505	Albaugh	OWN	
870.1100	Acute Oral Toxicity – Rat	CITE ALL		PAY	
870.1200	Acute Dermal Toxicity - Rat	CITE ALL		PAY	
870.1300	Acute Inhalation Toxicity - Rat	CITE ALL		PAY	
870.2400	Primary Eye Irritation - Rabbit	CITE ALL		PAY	
870.2500	Primary Dermal Irritation	CITE ALL		PAY	
870.2600	Dermal Sensitization	CITE ALL		PAY	
Signature		AM	Name and Title: Morris Gaskins Registrations Mar	nager	Date: 4/14/08
	and Paper versions available. Submit only paper versions	X-10	Agency Internal I		

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	DA	ATA MATRIX			
Date:			EPA Reg. No./File Symbol 4275	50-appl	Page 4 of 6
Applicant's/Registrant's Name	Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021		Product: TRICLOPYR TGAI III		
Ingredient: Triclopyr acid CAS					
Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
Triclopyr Acid generic data r	equirements		·		
Albaugh will make offers-to-pay	to the following companies that appear on the	e current data submi	tters list for triclopyr acid.		
Triclopyr Generic Data	Cite-All		Nufarm Americas (228)	PAY	
Triclopyr Generic Data	Cite-All		Dow Chemical (464)	PAY	
Triclopyr Generic Data	Cite-All		DuPont (352)	PAY	
Triclopyr Generic Data	Cite-All		Nufarm (35935)	PAY	,
Triclopyr Generic Data	Cite-All		BASF Sparks (51036)	PAY	
Triclopyr Generic Data	Cite-All		Dow Agroscience (62719)	PAY	
Triclopyr Generic Data	Cite-All		SDTF (66607)	PAY	
Triclopyr Generic Data	Cite-All		Sepro Corp (67690)	PAY	
Triclopyr Generic Data	Cite-All		Repar Corp (69361)	PAY	
Triclopyr Generic Data	Cite-All		ORETF (71754)	PAY	
Triclopyr Generic Data	Cite-All		Ag Re-entry TF (71755)	PAY	
Triclopyr Generic Data	Cite-All		Nations Ag II (72167)	PAY	
Triclopyr Generic Data	Cite-All		UPM Corp. (72680)	PAY	
Signature		Do	Name and Title: Morris Gaskins Registrations Ma	ınager	Date: 4/14/08

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

		DATA MATRIX			
Pate:			EPA Reg. No./File Symbol 42750-	appl	Page 5 of 6
pplicant's/Registrant's Name	& Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021		Product: TRICLOPYR TGAI III		
ngredient: Triclopyr acid CAS	# 55335-06-3				
Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
riclopyr Generic Data	Cite-All		Endangered Species TF (73989)	PAY	
riclopyr Generic Data	Cite-All		AHETF (75234)	PAY	
riclopyr Generic Data	Cite-All		GESTF (84653)	PAY	
<u> </u>					
ignature		and .	Name and Title: Morris Gaskins Registrations Mana	ger	Date: 4/14/08

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Footnotes for TRICLOPYR TGAI III Data Matrix (page 6 of 6)

Footnote 1

- 830.6314 Oxidation/Reduction: chemical incompatibility
- 830.6315 Flammability
- 830.6316 Explodability
- 830.6317 Storage Stability
- 830.6319 Miscibility
- 830.6320 Corrosion Characteristics
- 830.6321 Dielectric Breakdown
- 830.7100 Viscosity

This data is not required for Technical Grade products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

Footnote 2

830.1650 Formulation Process

Albaugh requests a waiver for this data requirement. Triclopyr TGAI III product is not deliberately formulated. See Guideline 830.1620.

Footnote 3

830.7220 Boiling Point/Range

Albaugh requests a waiver for this data requirement. Triclopyr TGAI III is a solid.

Footnote 4

- 830.7560 Partition Coefficient, Generator Column Method
- 830.7560 Partition Coefficient, Liquid Chromatography Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7550 Shake Flask Method.

Footnote 5

830.7860 Water Solubility, Generator Column Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7840 Shake Flask Method.

DP BARCODE: D353704; FILE SYMBOL No.: 42750-ROT; PRODUCT: Triclopyr TGAI III

Date: September 10, 2008

SUBJECT:

Product Chemistry Review of Triclopyr TGAI III / MUP

FROM:

Shyam B. Mathur, PhD

Product Chemistry Team Leader Technical Review Branch/RD (7505P)

TO:

Tobi Colvin-Snyder / James Tompkins, RM 25

Herbicide Branch / RD (7505P)

DP BARCODE: D353704 DECISION No.: 392284 File Symbol No.: 42750-ROT

PRODUCT: Triclopyr TGAI III / MUP

PCC: 116001

REGISTRANT: Albaugh Incorporation

USE: Herbicide FOOD USE: No

INTRODUCTION:

The registrant, Albaugh Incorporation, has submitted a registration application for the triclopyr TGAI III /MUP. The triclopyr TGAI III / MUP is produced by support of the application, the registrant has submitted 830 series group A data with MRID Nos. 474034-01 and 474034-02, a CSF for basic formulation (dated 04-14-08) and the product label. The registrant has not submitted but cited the group B data (physical-chemical properties). The registrant has claimed that the proposed triclopyr TGAI III / MUP is substantially similar to Albaugh's Triclopyr TGAI with Reg. No. 42750-123 (). TRB has been asked to evaluate the product chemistry data submitted and determine its similarity to the registered technical product.

SUMMARY OF FINDINGS:

- 1. The registrant has submitted a basic formulation CSF (dated 04-14-08) for triclopyr TGAI III /MUP. The average purity of the active ingredient in TGAI/MUP is 98.0%, as determined by the five batch analysis. The proposed certified limits for the AI are based on the standard certified limits as set forth in 40CFR\$158.350(b)(2). The proposed limits for impurities $\geq 0.1\%$ are based on the preliminary analysis and expected to occur in normal commercial production. The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) satisfy the data requirements of 40CFR\$158.320 and 158.350 respectively [MRID No. 474034-02].
- 2. The product chemistry data submitted corresponding to guideline reference 830.1600 (description of material used to produce the product) satisfy the data requirements of 40CFR§ 158.325 [MRID No. 474034-02].

DP BARCODE: <u>D353704</u>; FILE SYMBOL No.: <u>42750-ROT</u>; PRODUCT: <u>Triclopyr TGAI III</u>

3. The product chemistry data submitted corresponding to guideline reference 830.1620 (description of production process) satisfy the data requirements for 40CFR§158.330. The triclopyr TGAI III / mup was produced by

The applicant has provided the details of the chemical process with reaction conditions, equipment used, working up procedures, and quality assurance steps [MRID No. 474034-02].

- 4. The product chemistry data submitted corresponding to guideline reference 830.1670 (discussion on the formation of impurities) satisfy the data requirements for 40CFR§158.340. During the production of triclopyr tgai III /mup, the registrant discussed the formation of one major impurity present at the concentration of >0.1%. No other impurities were reported during the 5 batch analysis. The registrant has stated that there is no possibility of the formation of impurities of toxicological concern as there are no preexisting conditions or starting materials present in the production process which are required for their formation [MRID No. 474034-02].
- 5. The data submitted corresponding the guideline reference 830.1700 (preliminary analysis) satisfy the data requirements of 40CFR§158.345. The study was conducted under GLP requirements in compliance with 40CFR§160. The analysis study was performed by *eurofins / Product Safety Laboratories, Dayton, NJ, USA*. Five representative batches of the triclopyr tgai III / mup (product Safety Laboratories, Dayton, NJ, USA) were analyzed for percent active ingredient and the impurities. The identification & quantification of the AI and impurities were performed by combination of HPLC-UV (290nm) with external standard quantification. The analytical methods utilized a Supelco Ascentis RP-Amide column, 250 x 4.6 mm x 5 µm. The analytical methods were validated for accuracy, linearity, and precision [MRID Nos. 474034-01].
- 6. The data submitted corresponding the guideline reference 830.1800 (enforcement analytical method) satisfy the data requirements of 40CFR§158.355. The purity of the AI in the TGAI was determined by HPLC-UV (290 nm) by external standard method. The method was validated for precision, accuracy and linearity [MRID Nos. 474034-02].
- 7. The data cited corresponding to guidelines 830.6302 (color), 830.6303 (physical state), 830.6304 (odor), 830.6313 (stability to normal & elevated temperature, metal & metal ions), 830.7000 (pH), 830.7050 (UV/VIS), 830.7300 (density), 830.7220 (boiling point), 830.7550-7570 (partition coefficient), 830.7840-7860 (water solubility), 830.6314 (oxidation/reduction), 830.6315 (flammability), and 830.7950 (vapor pressure)satisfy the data requirements of 40CFR§158.310 (e) [cited MRID No. 466195-04].

DP BARCODE: D353704; FILE SYMBOL No.: 42750-ROT; PRODUCT: Triclopyr TGAI III

CONCLUSIONS:

The TRB has reviewed the product chemistry data submitted for triclopyr TGAI III / MUP () and has concluded that:

- All the product chemistry data submitted & cited corresponding to the guidelines 830 Series group A and group B are acceptable.
- 2. The proposed CSF for basic formulation (dated 04-14-08) is acceptable. No new impurities are listed in the proposed CSF. There is only one impurity reported in the CSF which is also present in the cited product.
- 3. The data cited corresponding to guidelines 830.6302 (color), 830.6303 (physical state), 830.6304 (odor), 830.6313 (stability to normal & elevated temperature, metal & metal ions), 830.7000 (pH), 830.7050 (UV/VIS), 830.7300 (density), 830.7220 (boiling point), 830.7550-7570 (partition coefficient), 830.7840-7860 (water solubility), 830.6314 (oxidation/reduction), 830.6315 (flammability), and 830.7950 (vapor pressure) satisfy the data requirements of 40CFR§158.310 (e) and are acceptable.
- 4. The registrant must either cite or submit data for the guidelines 830.6317 (one year storage stability), and 830.6320 (corrosion characteristics). The registrant can also request waivers for the guidelines with proper scientific justifications.
- 5. The registrant must conduct the one year storage stability (830.6317) and corrosion characteristics (830.6320) for the proposed triclopyr tgai III / mup under full GLP requirements. It is recommended that the observations should be made at the intervals of 0 (initial), 3 month, 6 month, 9 month, and 12 month (final). The results must be submitted to the Agency on completion.
- 6. The proposed product with File Symbol No. 42750-ROT was determined to be substantially similar to the registered product with Reg. No. 42750-123 from product chemistry point of view.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Similarity Action 07/FEB/2006

MEMORANDUM

Subject:

Name of Pesticide Product:

Triclopyr TGAI

EPA Reg. No. /File Symbol:

#42750-REG 173

Cited product

DP Barcode:

325862

Decision No.:

359509

PC Code:

116001

From:

Masih Hashim, Toxicologist

Technical Review Branch Registration Division (7505C)

To:

Tobi Calvin-Snyder, RM Team 25

Herbicide Branch

Registration Division (7505C)

Applicant:

Albaugh Inc.

Ankeny, IA 50021

FORMULATION FROM LABEL:

Active Ingredient(s):

by wt. %

Triclopyr

98.0

Inert Ingredients:

2.0

Total:

100.0

ACTION REQUESTED: Similarity action is requested between the Proposed File Symbol #42750-REG and the cited EPA Registered Product #62719-533 (formerly #51036-386).

RECOMMENDATIONS: TRB has evaluated the formulations of the proposed and the cited products (see above), and found them to be substantially similar. TRB has no

objection to bridging and between them.

The Signal Word is CAUTION.

The toxicology profile for the File Symbol #42750-REG is as follows:

acute oral toxicity	IIÍ	cited-acceptable	MRID 45451304
acute dermal toxicity	IV	cited-acceptable	MRID 45451305
acute inhalation study IV	cited-a	cceptable MRID	45451306
primary eye irritation	III	cited-acceptable	MRID 45451307
primary dermal irritation	IV	cited-acceptable	MRID 45451308
dermal sensitization	neg.	cited-acceptable	MRID 45451309

PRODUCT ID #:

042750-00123

PRODUCT NAME: Triclopyr TGAI

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Harmful if swallowed. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Avoid contact with eyes or clothing. Wear protective eyewear. Wear: Long-sleeved shirt and long pants, Socks, Shoes, and gloves.

First Aid:

If swallowed:

- -Call a poison control center or doctor immediately for treatment advice.
- -Have person sip a glass of water if able to swallow.
- -Do not induce vomiting unless told to by a poison control center or doctor.
- -Do not give anything to an unconscious person.

If on Skin or clothing:

- -Take off contaminated clothing.
- -Rinse skin immediately with plenty of water for 15-20 minutes.
- -Call a poison control center or doctor for treatment advice.

If in eyes:

- -Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- -Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

TRICLOPYR TGAI III

ACTIVE INGREDIENT:	
3,5,6-trichloro-2-pyridyloxyacetic acid	98.0%
INERT INGREDIENTS:	2.0%
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

EMERGENCY NUMBERS: Transportation or spill, call CHEMTREC 800-424-9300.

EPA Reg. No. 42750-xxx

EPA Est. No. Xxxxxx-xxx-xxx

NET CONTENTS:

Manufactured For: ALBAUGH, INC. ANKENY, IA 50021

PRECAUTIONARY STATEMENTS,

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Wear long-sleeved shirt and long pants, protective eyewear, socks, shoes, and gloves. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

NOTICE: Read the entire label. Use only according to label directions. Before buying or using this product, read WARRANTY LIMITATIONS AND DISCLAIMER elsewhere on this label.

AGRICULTURAL CHEMICAL - Do not ship or store with food, feeds, drugs or clothing

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may be used to manufacture products that:

- 1. Contain triclopyr butoxyethyl ester (BEE) for use on rangeland, permanent pastures, forestry, turf, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, fence rows, industrial sites and conservation reserve program (CRP) areas.
- 2. Contain triclopyr triethylanolamine (TEA) for use on rangeland, permanent pastures, forestry, turf, Christmas tree plantations, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, rice, fencerows, industrial sites and conservation reserve program (CRP) areas.
- 3. Specific uses not listed on the MP label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such uses.

NOTE: Because of their properties and intended uses, formulations containing TRICLOPYR 98% TECHNICAL ACID may require precautionary labeling differing from that given on this label. Formulators should develop their own use and precautionary labeling based on the properties and intended uses of their own formulations and in accordance with all pertinent laws and regulations.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 28 F away from moisture.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes "cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

GENERAL: Consult Federal, state or local disposal authorities for approved alternative procedures.

WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTEES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

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	DATA MATRIX		
Date: 4/14/08		EPA Reg. No./File Symbol 42750-appl	Page 1 of 6
Applicant's/Registrant's Name & Address:	Albaugh Inc.	Product:	
	121 NE 18 th St.	TRICLOPYR TGAI III	
	Ankeny, IA 50021		

Guideline Reference	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	With application	Albaugh	OWN	
830.1600	Description of Materials Used to Produce the	With application	Albaugh	OWN	
830.1620	Description of Product Process	With application	Albaugh	OWN	
830.1650	Description of Formulation Process				Waiver ²
830.1670	Description of Formation of Impurities	With application	Albaugh	OWN	
830.1700	Preliminary Analysis	With application	Albaugh	OWN	
830.1750	Certified Limits	With application	Albaugh	OWN	
830.1800	Enforcement Analytical Method	With application	Albaugh	OWN	
830.6302	Color	46619504	Albaugh	OWN	
830.6303	Physical State	46619504	Albaugh	OWN	
830.6304	Odor	46619504	Albaugh	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	46619504	Albaugh	OWN	
830.6314	Oxidation/Reduction: Chemical Incompatibility				Not req'd1
830.6315	Flammability				Not req'd1
830.6316	Explodability				Not req'd1
830.6317	Storage Stability				Not req'd1
Signature	Mos Ha		Name and Title: Mo	rris Gaskins gistrations Manager	Date: 4/14/08

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·	DATA	MATRIX			
Date:			EPA Reg. No./File Symbol 4275	50-appl	Page 2 of 6
Applicant's/Registrant's Name & Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021 Ingredient: Triclopyr acid CAS # 55335-06-3					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6319	Miscibility				Not req'd1
830.6320	Corrosion Characteristics				Not req'd1
830.6321	Dielectric Breakdown Voltage				Not req'd1
830.7000	pH	46619504	Albaugh	OWN	
830.7050	UV/Visible Absorption	46619504	Albaugh	OWN	
830.7100	Viscosity				Not req'd1
830.7200	Melting Point/Melting Range	46619504	Albaugh	OWN	
830.7220	Boiling Point/Boiling Range				Waiver ³
830.7300	Density/Relative Density/Bulk Density	46619504	Albaugh	OWN	
830.7370	Dissociation Constants in Water	46619504	Albaugh	OWN	
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	46619506	Albaugh	OWN	
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Waiver ⁴
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Waiver ⁴
Signature	K	Apr	Name and Title: Morris Gaskins Registrations		Date: 4/14/08

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	DATA	A MATRIX			
Date:			EPA Reg. No./File Symbol 42	2750-appl	Page 3 of 6
Applicant's/Registrant's Name 8	& Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021		Product: TRICLOPYR TGA	ıı III	
Ingredient: Triclopyr acid CAS	# 55335-06-3				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	46619504	Albaugh	OWN	
830.7860	Water Solubility, Generator Column Method				Waiver ⁵
830.7950	Vapor Pressure	46619505	Albaugh	OWN	
870.1100	Acute Oral Toxicity – Rat	CITE ALL		PAY	
870.1200	Acute Dermal Toxicity - Rat	CITE ALL		PAY	
870.1300	Acute Inhalation Toxicity - Rat	CITE ALL	·	PAY	
870.2400	Primary Eye Irritation - Rabbit	CITE ALL		PAY	
870.2500	Primary Dermal Irritation	CITE ALL		PAY	
870.2600	Dermal Sensitization	CITE ALL		PAY	
Signature		ATI_	Name and Title: Morris Gaskins Registrations		Date: 4/14/08
TDA Form 0F70 JE (0.07) Floringia	and Paper versions available. Submit only paper versions	9-10	Agency Interr		

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	1	DATA MATRIX			
Date:			EPA Reg. No./File Symbol 42750-appl		Page 4 of 6
Applicant's/Registrant's Name & Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021		Product: TRICLOPYR TGAI III			
Ingredient: Triclopyr acid CAS	# 55335-06-3				
Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
Triclopyr Acid generic data re	equirements				
Albaugh will make offers-to-pay	to the following companies that appear on t	the current data submi	itters list for triclopyr acid.		
Triclopyr Generic Data	Cite-All		Nufarm Americas (228)	PAY	
Triclopyr Generic Data	Cite-All		Dow Chemical (464)	PAY	
Triclopyr Generic Data	Cite-All		DuPont (352)	PAY	
Triclopyr Generic Data	Cite-All		Nufarm (35935)	PAY	,
Triclopyr Generic Data	Cite-All		BASF Sparks (51036)	PAY	
Triclopyr Generic Data	Cite-All		Dow Agroscience (62719)	PAY	
Triclopyr Generic Data	Cite-All		SDTF (66607)	PAY	
Triclopyr Generic Data	Cite-All		Sepro Corp (67690)	PAY	
Triclopyr Generic Data	Cite-All		Repar Corp (69361)	PAY	
Triclopyr Generic Data	Cite-All		ORETF (71754)	PAY	
Triclopyr Generic Data	Cite-All		Ag Re-entry TF (71755)	PAY	
Triclopyr Generic Data	Cite-All		Nations Ag II (72167)	PAY	
Triclopyr Generic Data	Cite-All		UPM Corp. (72680)	PAY	
Signature		De	Name and Title: Morris Gaskins Registrations Ma	nager	Date: 4/14/08
-DA = 0570 05 (0 07) FI : :			A Tokawa	TI.T I' -	

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		DATA MATRIX			
Date:		EPA Reg. No./File Symbol 42750-appl		Page 5 of 6	
Applicant's/Registrant's Name & Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021		Product: TRICLOPYR TGAI III			
Ingredient: Triclopyr acid CAS	# 55335-06-3				
Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
Triclopyr Generic Data	Cite-All		Endangered Species TF (73989)	PAY	
Triclopyr Generic Data	Cite-All		AHETF (75234)	PAY	1
Triclopyr Generic Data	Cite-All		GESTF (84653)	PAY	
				· · · · · · · · · · · · · · · · · · ·	
Signature		W	Name and Title: Morris Gaskins Registrations Mana	ger	Date: 4/14/08
EDA Form 9570.35 (0.07) Flortronic	and Paper versions available. Submit only pan	or vorsion	Agency Internal	Iso Conv	

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Footnotes for TRICLOPYR TGAI III Data Matrix (page 6 of 6)

Footnote 1

- 830.6314 Oxidation/Reduction: chemical incompatibility
- 830.6315 Flammability
- 830.6316 Explodability
- 830.6317 Storage Stability
- 830.6319 Miscibility
- 830.6320 Corrosion Characteristics
- 830.6321 Dielectric Breakdown
- 830.7100 Viscosity

This data is not required for Technical Grade products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

Footnote 2

830,1650 Formulation Process

Albaugh requests a waiver for this data requirement. Triclopyr TGAI III product is not deliberately formulated. See Guideline 830.1620.

Footnote 3

830.7220 Boiling Point/Range

Albaugh requests a waiver for this data requirement. Triclopyr TGAI III is a solid.

Footnote 4

- 830.7560 Partition Coefficient, Generator Column Method
- 830.7560 Partition Coefficient, Liquid Chromatography Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7550 Shake Flask Method.

Footnote 5

830.7860 Water Solubility, Generator Column Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7840 Shake Flask Method.

.5 NE 35th Street ikeny, IA 50021 15.964.9444 - Office 00.247.8013 - Toll Free 15.964.7813 - Facsimile P.O. Box 2127 304 Janet Street, Suite H Valdosta, GA 31604 229.244.3288 - Office 229.244.5841 - Facsimile

FEDERAL EXPRESS

April 11, 2008

Mr. Jim Tompkins (PM 25) Registration Division Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency 2777 South Crystal Dr. Arlington, VA 22202

RE:

Triclopyr TGAI II

EPA Reg. No. 42750-appl

Dear Mr. Tompkins,

The enclosed submission is Albaugh's initial application for the above referenced product. Albaugh is submitting this as a "me too" of Albaugh's existing Triclopyr TGAI (EPA Reg. No. 42750-123) and accordingly have cited the 830-B Phys/Chem studies for that registration.

Albaugh believes this application qualifies as a PRIA II R310 classification with a \$4,360 fee and 6 month review time. The fee payment has been submitted to the EPA lockbox concurrently with this application.

Documents supporting this application are detailed on the enclosed transmittal page.

Please call if you have any questions.

Regards,

Morris Gaskins

Registrations Manager

Albaugh, Inc.

229-244-3288





TRANSMITTAL DOCUMENT

Name and address of submitter:

Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604-2127

Company Official: Morris Gaskins

Telephone: (229) 244-3288

Regulatory action for which this package is submitted:

Initial application to register Triclopyr TGAI II

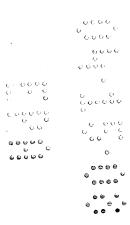
Transmittal Date: April 11, 2008

List of items submitted:

- Transmittal page
- Cover letter
- 8570-1 application form
- PRIA fee check copy
- 8570-34 Certification With Respect to Citation of Data form
- 8570-35 Data Matrix (internal use copy)
- 8570-35 Data Matrix (public file copy)
- Draft label (5 copies)
- Basic CSF (2 copies)

• Series 830-A Preliminary Analysis and Enforcement Analytical Methods (OPPTS Guidelines 830.1700 and 830.1800) (3 copies)

• Series 830-A Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities and Certified Limits (OPPTS Guidelines 830.1550, 830.1600, 830.1620, 830.1670 and 830.1750) (3 copies)



CORPORATE OFFICE

1525 NE 36th Street Ankeny, IA 50021 515.964.9444 - Office 800.247.8013 - Toll Free 515.964.7813 - Facsimile

ALBAUGH, INC.

Valdosta Office

P.O. Box 2127 304 Janet Street, Suite H Valdosta, GA 31604 229.244.3288 - Office 229.244.5841 - Facsimile

E-Mail

June 3, 2008

Ms. Tobi Colvin-Snyder (Team 25) Registration Division Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency One Potomac Yard (South Bldg) 2777 South Crystal Dr. Arlington, VA 22202

RE:

Triclopyr TGAI II

EPA File Symbol 42750-ROR

Dear Ms. Colvin-Snyder,

This letter is Albaugh's waiver request for the following product chemistry guidelines in support of the application submitted on April 11, 2008 for the above referenced application.

GUIDELINE	COMMENT
830.6314 Oxidation/Reduction: chemical incompatibility 830.6315 Flammability 830.6316 Explodability 830.6317 Storage Stability 830.6319 Miscibility 830.6320 Corrosion Characteristics 830.6321 Dielectric Breakdown 830.7100 Viscosity	These data guidelines are not required for Technical Grade products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2. Accordingly Albaugh requests a waiver from these data requirements.
830.1650 Formulation Process	Albaugh requests a waiver for this data requirement. Triclopyr TGAI II product is not deliberately formulated. See Guideline 830.1620.
830.7220 Boiling Point/Range	Albaugh requests a waiver for this data requirement. Triclopyr TGAI II is a solid.
830.7560 Partition Coefficient, Generator Column Method 830.7560 Partition Coefficient, Liquid Chromatography Method	Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7550 Shake Flask Method.
830.7860 Water Solubility, Generator Column Method	Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7840 Shake Flask Method.

Please call if you have any questions.

Regards,

Morris Gaskins Registrations Manager

Albaugh, Inc. 229-244-3288

Agri Star YM By Albaugh. Inc



TRANSMITTAL DOCUMENT

Name and address of submitter:

Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604-2127

Company Official: Morris Gaskins

Telephone: (229) 244-3288

Regulatory action for which this package is submitted:

Initial application to register Triclopyr TGAI III

Transmittal Date: April 14, 2008

List of items submitted:

- Transmittal page
- Cover letter
- 8570-1 application form
- 8570-34 Certification With Respect to Citation of Data form
- 8570-35 Data Matrix (internal use copy)
- 8570-35 Data Matrix (public file copy)
- Draft label (5 copies)
- Basic CSF (2 copies)
- Series 830-A Preliminary Analysis and Enforcement Analytical Methods (OPPTS Guidelines 830.1700 and 830.1800) (3 copies)
- Series 830-A Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities and Certified Limits (OPPTS Guidelines 830.1550, 830.1600, 830.1620, 830.1670 and 830.1750) (3 copies)



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.

Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.				
Certification with Respect to Citation of Data				
Applicant's/Registrant's Name, Address, and Telephone Number Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604	EPA Registration Number/File Symbol 42750-appl			
Active Ingredient(s) and/or representative test compound(s) triclopyr acid	Date 4/11/08			
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158 terrestrial food use, terrestrial non-food use	Product Name Triclopyr TGAI III			
NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).				
I am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	list of companies se	ent offers of compensation (the Data Matrix form should		
SECTION I: METHOD OF DATA SUPP	ORT (Check one m	ethod only)		
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose). I am using the selective method of support (or cite under the selective method), and have included with this form under the selective method), and have included with this form under the selective method of support (or cite under the selective method), and have included with this form under the selective method of support (or cite under the selective method), and have included with this form should be used for this purpose).				
SECTION II: GENERAL	OFFER TO PAY			
[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements] I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.				
SECTION III: CERT	IFICATION			
I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.				
I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.				
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the c.igi.lal data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.				
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.				
l certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				
Signature Date April 14, 2008 Typed or Printed Name and Title Morris Gaskins Registrations Manager				

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.

Fee for Service



	·		
This package includes the following	for Division		
New RegistrationAmendment	○ AD ○ BPPD ○ RD		
Studies? Fee Waiver? volpay % Reduction:	Risk Mgr. 25		
Receipt No. S- EPA File Symbol/Reg. No. Pin-Punch Date:	827807 42750-ROT 4/16/2008		
This item is NOT subject t	o FFS action.		
Action Code:	Parent/Child Decisions:		
Requested: R-310 Granted: R-310 Amount Due: \$ 4,360			
Inert Cleared for Intended Use	Uncleared Inert in Product		
Reviewer: Tomphum	Date: <u>4/17/08/</u>		
Remarks: Trature			

Page 2

DP#: (353704)

* * * Studies Sent for Review * * *

Decision#: (392284) MRID MRID Status Citation Reference Guideline Sheehy, J. (2008) Preliminary Analysis: Triclopyr Acid Technical 830.1700/Preliminary analysis 47401901 (NUP-07056). Project Number: P809MS, 23996, 071226. Unpublished study prepared by Product Safety Laboratories. 97 Westmoreland, D. (2008) Triclopyr Technical Acid, NUP-07056: 830.1550/Product Identity and 47401902 Product Identity and Process. Project Number: RTP/08/029/REG. composition Unpublished study prepared by Nufarm Americas, Inc. 80 p. Westmoreland, D. (2008) Triclopyr Technical Acid, NUP-07056: 830.1600/Description of materials 47401902 Product Identity and Process. Project Number: RTP/08/029/REG. used to produce the product Unpublished study prepared by Nufarm Americas, Inc. 80 p. Westmoreland, D. (2008) Triclopyr Technical Acid, NUP-07056: 830.1620/Description of production 47401902 Product Identity and Process. Project Number: RTP/08/029/REG. process Unpublished study prepared by Nufarm Americas, Inc. 80 p. Westmoreland, D. (2008) Triclopyr Technical Acid, NUP-07056: 47401902 830.1670/Discussion of formation of Product Identity and Process. Project Number: RTP/08/029/REG. impurities Unpublished study prepared by Nufarm Americas, Inc. 80 p. Westmoreland, D. (2008) Triclopyr Technical Acid, NUP-07056: 830.1750/Certified limits 47401902 Product Identity and Process. Project Number: RTP/08/029/REG. Unpublished study prepared by Nufarm Americas, Inc. 80 p. Westmoreland, D. (2008) Triclopyr Technical Acid, NUP-07056: 47401902 830.1800/Enforcement analytical Product Identity and Process. Project Number: RTP/08/029/REG. method Unpublished study prepared by Nufarm Americas, Inc. 80 p.



U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division (H7505C) 401 "M" St., S.W. Washington, D.C. 30460

| Number: | 42750-| 123

EPA Reg.

Date of Issuance:

APR 6 2006 APR 6 2006

Term of Issuance:

Conditional

Name of Pesticide Product:

Triclopyr TGAI

<u>x</u> Registration Reregistration

NOTICE OF PESTICIDE:

(under PIFRA, as amended)

Name and Address of Registrant (include ZIP Code);

Mr. Morris Gaskins Albaugh Inc.

Ankeny, IA 50021

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce: an any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

- 1. Submit and/or cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit such data.
 - Make the following changes to your labeling:
 - a. Change the registration number to "42750-123"
 - b. In the Precautionary Statements section, after "... and handling" add "and before eating, drinking, chewing gum, or using tobacco. Wear long-sleeved shirt and long pants, protective eyewear, socks, shoes, and gloves."
- 3. Submit final labeling for this product within 30 days of the date of this letter

Signature of Approving Official.

Date

1-6-0

EPA Porm 8570-6

page 2 EPA Reg. No.42750-123

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

If you have any questions about this letter, please contact Tobi Colvin-Snyder at 703-305-7801.

Jim Tompkins Product Manager (25) Herbicide Branch Registration Division (7505C)

TRICLOPYR TGAI

An Herbleide for Manufacturing Use Only

ACTIVE INGREDIENT:	
3,5,6-trichloro-2-pyridyloxyacetic acid	98.0%
INERT INGREDIENTS:	2.0%
	100 09

KEEP OUT OF REACH OF CHILDREN

CAUTION

ACCEPTED vish COMMENTS in IPA Letter Dated

Under the Federal Insecticide,

Fundicide, and Rodenticide Act

no microled, for the pesticide

FIRST AID

6 2006

IF SWALLOWED:

Call a poison control center or doctor immediately for treatment advice.

Do not give anything by mouth to an unconsolate.

IF ON SKIN OR CLOTHING:

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes.

Call a poison control center or doctor for treatment advice.

IF IN EYES:

Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

EPA Reg. No. 42750-xx

EPA Est. No. XXX-XX-XXX

NET CONTENTS:

Manufactured For: ALBAUGH, INC. ANKENY, IA 50021

PRECAUTIONARY STATEMENTS.

Hazards to Humans and Domestic Animals

CAUTION. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with scap and water after handling. Remove and wash contaminated clothing before reuse.

EMERGENCY NUMBERS: Transportation or spill, call CHEMTREC 800-424-9300.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

NOTICE: Read the entire label. Use only according to label directions. Before buying or using this product, read WARRANTY LIMITATIONS AND DISCLAIMER elsewhere on this label.

AGRICULTURAL CHEMICAL - Do not ship or store with food, feeds, drugs or clothing

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may be used to manufacture products that:

- Contain triclopyr butoxyethyl ester (BEE) for use on rangeland, permanent pastures, forestry, turf, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, fence rows, industrial sites and conservation reserve program (CRP) areas.
- 2. Contain triclopyr triethylanolamine (TEA) for use on rangeland, permanent pastures, forestry, turf, Christmas tree plantations, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, rice, fencerows, industrial sites and conservation reserve program (CRP) areas.
- Specific uses not listed on the MP label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such uses.

NOTE: Because of their properties and intended uses, formulations containing TRICLOP*R*98% TECHNICAL ACID may require precautionary labeling differing from that given on this label. Formulators should develop their own use and precautionary labeling based on the properties and intended uses of their own formulations and in accordance with all pertinent laws and regulations.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 28 F away from moisture.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes "cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

GENERAL: Consult Federal, state or local disposal authorities for approved alternative procedures.

WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTEES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES Similarity Action

07/FEB/2006

<u>MEMORANDUM</u>

Subject:

Name of Pesticide Product:

Triclopyr TGAI

EPA Reg. No. /File Symbol: #42750-REG

DP Barcode:

325862

Decision No.:

359509

PC Code:

116001

From:

Masih Hashim, Toxicologist⊢

Technical Review Branch

Registration Division (7505C)

To:

Tobi Calvin-Snyder, RM Team 25

Herbicide Branch

Registration Division (7505C)

Applicant:

Albaugh Inc.

Ankeny, IA 50021

FORMULATION FROM LABEL:

Active Ingredient(s):

<u>by wt.</u> %

Triclopyr

98.0

Inert Ingredients:

2.0

Total:

100.0

ACTION REQUESTED: Similarity action is requested between the Proposed File Symbol #42750-REG and the cited EPA Registered Product #62719-533 (formerly #51036-386).

RECOMMENDATIONS: TRB has evaluated the formulations of the proposed and the cited

products (see above), and found them to be substantially similar. TRB has no objection to bridging data between them.

The Signal Word is CAUTION.

The toxicology profile for the File Symbol #42750-REG is as follows:

acute oral toxicity	III	cited-acceptable	MRID 45451304
acute dermal toxicity	IV	cited-acceptable	MRID 45451305
acute inhalation study	IV	cited-acceptable	MRID 45451306
primary eye irritation	III	cited-acceptable	MRID 45451307
primary dermal irritation	IV	cited-acceptable	MRID 45451308
dermal sensitization	neg.	cited-acceptable	MRID 45451309

PRODÚCTID#:

042750-00123

PRODUCT NAME: Triclopyr TGAI

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Harmful if swallowed. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Avoid contact with eyes or clothing. Wear protective eyewear. Wear: Long-sleeved shirt and long pants, Socks, Shoes, and gloves.

First Aid:

If swallowed:

- -Call a poison control center or doctor immediately for treatment advice.
- -Have person sip a glass of water if able to swallow.
- -Do not induce vomiting unless told to by a poison control center or doctor.
- -Do not give anything to an unconscious person.

If on Skin or clothing:

- -Take off contaminated clothing.
- -Rinse skin immediately with plenty of water for 15-20 minutes.
- -Call a poison control center or doctor for treatment advice.

If in eyes:

- -Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- -Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES Similarity Action

07/FEB/2006

<u>MEMORANDUM</u>

Subject:

Name of Pesticide Product: Triclopyr TGAI

EPA Reg. No. /File Symbol: #42750-REG

DP Barcode:

325862

Decision No.:

359509

PC Code:

116001

From:

Masih Hashim, Toxicologist\√/

Technical Review Branch

Registration Division (7505C)

To:

Tobi Calvin-Snyder, RM Team 25

Herbicide Branch

Registration Division (7505C)

Applicant:

Albaugh Inc.

Ankeny, IA 50021

FORMULATION FROM LABEL:

Active Ingredient(s):

by wt. %

Triclopyr

98.0

Inert Ingredients:

2.0

Total:

100.0

ACTION REQUESTED: Similarity action is requested between the Proposed File Symbol #42750-REG and the cited EPA Registered Product #62719-533 (formerly #51036-386).

RECOMMENDATIONS: TRB has evaluated the formulations of the proposed and the cited

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The Signal Word is CAUTION.

The toxicology profile for the File Symbol #42750-REG is as follows:

acute oral toxicity	III	cited-acceptable	MRID 45451304
acute dermal toxicity	IV	cited-acceptable	MRID 45451305
acute inhalation study	IV	cited-acceptable	MRID 45451306
primary eye irritation	Ш	cited-acceptable	MRID 45451307
primary dermal irritation	IV	cited-acceptable	MRID 45451308
dermal sensitization	neg.	cited-acceptable	MRID 45451309

PRODUCTID #:

042750-00123

PRODUCT NAME: Triclopyr TGAI

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Harmful if swallowed. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Avoid contact with eyes or clothing. Wear protective eyewear. Wear: Long-sleeved shirt and long pants, Socks, Shoes, and gloves.

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- -Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

Confidential Statement of Formula may be entitled to confidential treatment

Tech-mus Non Ford Scheet PN 25

PRIA 2 – 21 Day Content Screen Review Worksheet

	(EPA/OPP Use O	nly)	
	1/ A C 4/9/08		
21 Day Screen Start Date:	16-08		√
Experts In-Processing Signature: _	Mughan	Date 4 76.08	Fee Paid: Yes
Division management contacted on	issues NoYes	Date	

EPA	Reg. Number: 42750-Ro- EPA Receipt Date: 4//	6/05	,		
	Items for Review		Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including page type	/			
	Confidential Statement of Formula all boxes completed, form signed dated (EPA Form 8570-4)				
2	a) All inerts, except fragrances, approved for food and non food proposed uses (see Footnote A)	NA TGA	No	Inerts	
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)	1	~ ~	1	
	Certificate and data matrix consistent	V	THE STATE OF THE S		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)		· · · · · ·		
	If applicable, is there a letter of Authorization for exclusive use only.		i.		1 /
4	Formulator's Exemption Statement (EPA Form 8570-27) completed signed (N/A if source is unregistered or applicant owns the technical)		M		
	Data Matrix (EPA Form 8570-35) both internal and external copies (I completed and signed (N/A if 100% repack)	PR 98-5)	/		
5	a) Selective Method (Fee category experts use)	no no			
	b) Cite-All (Fee category experts use)				
	c) Applicant owns all data (Fee category experts use)				
6	5 Copies of Label (Electronic labels on CD are encouraged)			and a second	
7	Is the data package consistent with PR Notice 86-5				,
8	Notice of Filing (link to included with petitions				

9	If applicable for conventional applications, reduced risk rationale		
	Required Data and/or data waivers. See Footnote C.		
,	a) List study (or studies) not included with application	ļ	
10			
Comn	nents:		

^{*} N/A – Not Applicable

Footnotes

A. This consideration does not apply to PRIA applications that include a request to approve an inert in the fee category. For these PRIA actions, information needs to be submitted to enable the Agency to review the inert approval request and will be a subject of the 21 day content screen. For other types of actions and for fragrances, the answer is only for the Agency's information and current policies, processes, and procedures should be consulted. This worksheet will be updated in the future to be consistent with current policies.

If brand, trade, or proprietary names are being used for some inert ingredients listed on the CSF, alternate names or additional information on the nature of the ingredient(s) should be provided to allow the Agency to determine whether the inert has been approved.

- B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.
- C. Refer to the list of data requirements. Biopesticide applicants were advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

Memorandum 42750-ROT

Date:	4/23/08
То:	fm 25 , Regulatory Manager
From:	Information Services Branch, ITRMD
indicati	our receipt of this data submission is not an on that MRIDs for the enclosed studies have ested to OPPIN.
from tl	e expect that it will be approximately 5 days ne above date before the study-level data is ble in OPPIN.
=	you have any questions about this process, contact Teresa Downs (305-5363).
This is	a:

SEPA

ADMINISTRATIVE NO(S):	42750 - ROT
PM: 25	
CHEMICAL NO.:	

The jacket for this action can be requested through the JACKETS system.

FEE FOR SERVICE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

April 18, 2008

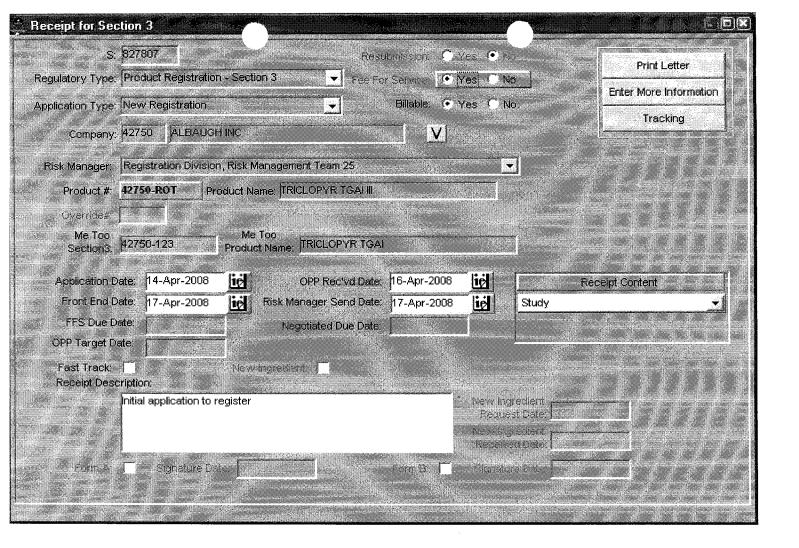
OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

ALBAUGH, INC ALBAUGH INC PO Box 2127 VALDOSTA, GA 31604-2127

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 16-APR-08. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.





TRANSMITTAL DOCUMENT

Name and address of submitter:

Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604-2127

Company Official: Morris Gaskins

Telephone: (229) 244-3288

Regulatory action for which this package is submitted:

Initial application to register Triclopyr TGAI III

Transmittal Date: April 14, 2008

List of items submitted:

- Transmittal page
- Cover letter
- 8570-1 application form
- 8570-34 Certification With Respect to Citation of Data form
- 8570-35 Data Matrix (internal use copy)
- 8570-35 Data Matrix (public file copy)
- Draft label (5 copies)
- Basic CSF (2 copies)

47403401

 Series 830-A Preliminary Analysis and Enforcement Analytical Methods (OPPTS Guidelines 830.1700 and 830.1800) (3 copies)

47403402

 Series 830-A Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities and Certified Limits (OPPTS Guidelines 830.1550, 830.1600, 830.1620, 830.1670 and 830.1750) (3 copies)



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DATA PACKAGE BEAN SHEET

Date: 16-Jun-2008

Page 1 of 2

Decision #: 392284

DP #: (353706)

PRIA

Parent DP #:

Submission #: 827807

	submission #: 827807			
Registration:	42750-ROT - TRIC	CLOPYR TGAI III		
Company:	42750 - ALBAUGH INC	o		
Risk Manager:	RM 25 - James Tompk			
Risk Manager Reviewer:	Tobi Colvin-Snyder TS	SNYDER		
Sent Date:	17-Apr-2008	Edited Due Date:		
Type of Registration:	Product Registration -			
Action Desc:	(R310) NEW PRODUC	CT;NON-FAST TRACK (INCL	UDES REVIEWS OF	PRODUCT CHEMIST
Ingredients:				
	* *	* Data Package Ir	nformation * *	*
Expedite:	◯ Yes ● No	Date Se	ent: 16-Jun-2008	Due Back:
DP Ingredient:				
	Acute Toxicology Simi Yes No	larity Determination Label Included: Yes	○ No Parent	DP #:
Assigned T	<u>o</u>	Date In	Date Out	
Organization: RD / 1	rb		[ast Possible Science Due Date: 04-Oct-2008
Team Name:	- Marine - California - Califor		ways .	Science Due Date:
				Sub Data Package Due Date:
Contractor Name:				

* * * Studies Sent for Review * * *

No Studies

* * * Additional Data Package for this Decision * * *

Printed on Page 2

* * * Data Package Instructions * * *

Please see DP#353700

Page 2

DP#: (35370	6)	* * * Addi.	I Data Packa	ge for this De	cision * * *		Decisio	n#: (392284)
DP#	Division/Brai	ncn	Date Sent	Date Due	Instruction	ıs?	CSF	label
353704	RD / TRB		16-Jun-2008	04-Oct-2008	Yes	No 💮 Ye	es 🔘 No	Yes 🔘 No
353704	RD / HB		16-Jun-2008	04-Oct-2008	Yes	No 🌑 Ye	es 🔘 No (Yes 🔘 No

DATA PACKAGE BEAN SHEET

Date: 16-Jun-2008

Page 1 of 2

Decision #: 392284

DP #: (353704)

PRIA

Parent DP #:

Submission #: 827807

	* *	* Registration Info	ormation * * *	Submission #: 62/60/
Registration:	42750-ROT - TRIC	LOPYR TGAI III	-	
Company:	42750 - ALBAUGH INC			
Risk Manager:	RM 25 - James Tompkir	ns - (703) 305-5697 Room# I	PY1 S-7337	_
Risk Manager Reviewer:	Tobi Colvin-Snyder TSI	NYDER		<u></u>
Sent Date:	17-Apr-2008	Calculated Due Date	e: <u>03-Nov-2008</u>	Edited Due Date:
Type of Registration:	Product Registration - S	ection 3		
Action Desc:	(R310) NEW PRODUCT	;NON-FAST TRACK (INCLU	JDES REVIEWS OF P	RODUCT CHEMIST
Ingredients:				
	* *	* Data Package In		
Expedite:	○ Yes ● No	Date Ser	nt: 16-Jun-2008	Due Back:
DP Ingredient:				
				•
DP Title:	Product Chemistry Revi	ew		*
CSF Included:	● Yes ○ No	Label Included: • Yes	No Parent DF) #:
Assigned T	o_	Date In	Date Out	
Organization: RD / 1	rrb		Las	t Possible Science Due Date: 04-Oct-2008
Team Name:				Science Due Date:
Reviewer Name:				Sub Data Package Due Date:

* * * Studies Sent for Review * * *

Printed on Page 2

* * * Additional Data Package for this Decision * * *

No Additional Data Packages

* * * Data Package Instructions * * *

Please see DP#353539

Contractor Name:

Page 2

DP#: (353704)

* * * Studies Sent for Review * * *

Decision#: (392284)

MRID MRID Status	Citation Reference	Guideline
47401901	Sheehy, J. (2008) Preliminary Analysis: Triclopyr Acid Technical (NUP-07056). Project Number: P809MS, 23996, 071226. Unpublished study prepared by Product Safety Laboratories. 97 p.	830.1700/Preliminary analysis
47401902	Westmoreland, D. (2008) Triclopyr Technical Acid, NUP-07056: Product Identity and Process. Project Number: RTP/08/029/REG. Unpublished study prepared by Nufarm Americas, Inc. 80 p.	830.1550/Product Identity and composition
47401902	Westmoreland, D. (2008) Triclopyr Technical Acid, NUP-07056: Product Identity and Process. Project Number: RTP/08/029/REG. Unpublished study prepared by Nufarm Americas, Inc. 80 p.	830.1600/Description of materials used to produce the product
47401902	Westmoreland, D. (2008) Triclopyr Technical Acid, NUP-07056: Product Identity and Process. Project Number: RTP/08/029/REG. Unpublished study prepared by Nufarm Americas, Inc. 80 p.	830.1620/Description of production process
47401902	Westmoreland, D. (2008) Triclopyr Technical Acid, NUP-07056: Product Identity and Process. Project Number: RTP/08/029/REG. Unpublished study prepared by Nufarm Americas, Inc. 80 p.	830.1670/Discussion of formation of impurities
47401902	Westmoreland, D. (2008) Triclopyr Technical Acid, NUP-07056: Product Identity and Process. Project Number: RTP/08/029/REG. Unpublished study prepared by Nufarm Americas, Inc. 80 p.	830.1750/Certified limits
47401902	Westmoreland, D. (2008) Triclopyr Technical Acid, NUP-07056: Product Identity and Process. Project Number: RTP/08/029/REG. Unpublished study prepared by Nufarm Americas, Inc. 80 p.	830.1800/Enforcement analytical method



WASHINGTON, D.C. 20460

April 17, 2008

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

OPP Decision Number: D-392284

EPA File Symbol or Registration Number: 42750-ROT

Product Name: TRICLOPYR TGAI III

EPA Receipt Date: 16-Apr-2008 EPA Company Number: 42750 Company Name: ALBAUGH INC

MORRIS GASKINS ALBAUGH, INC ALBAUGH INC PO Box 2127 VALDOSTA, GA 31604-2127

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R310

NEW PRODUCT; NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMISTRY; ACUTE TOXICITY; PUBLIC HEALTH PEST EFFICACY);

No additional payment is due at this time.

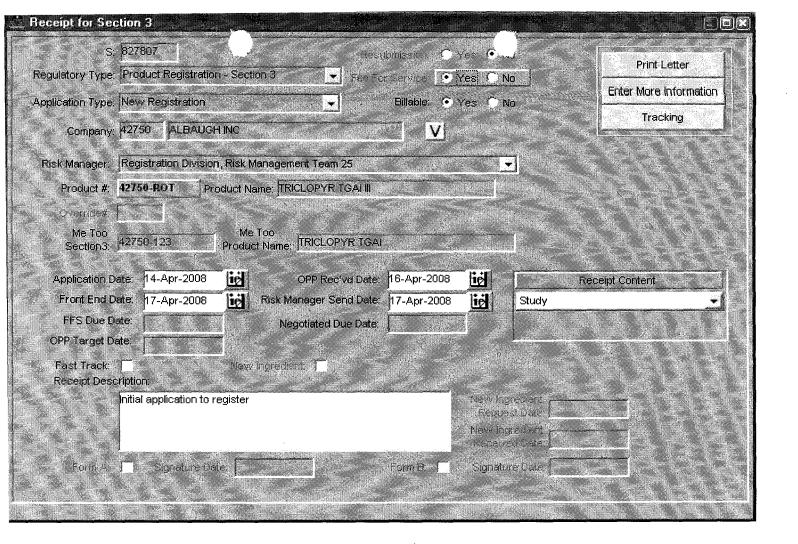
If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 305-6249.

Peresa C

Sincerely,

Front End Processing Staff

Information Technology & Resources Management Division



FEE FOR SERVICE

Please read instructions on	revers	se before comple	<u>t rm.</u>			Form App	roved	<u>. (No.</u>	2070-00	30. Approval expires 2-28-9
United States Environmental Protection Age Washington, DC 20460			ncy		√	Registr Amend Other		OPP Identifier Number		
			Applicat	ion for I	Pesticid	e - Sect	tion	l		<u>'</u>
1. Company/Product Number 42750-appl RoT	r					roduct Mana			3. P	roposed Classification
4. Company/Product (Name Triclopyr TGAI III)				PM# 25					
5. Name and Address of Applicant (Include ZIP Code) Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604-2127 Check if this is a new address					6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 42750-123 Product Name Triclopyr TGAI					
<u> </u>				Sec	tion - II					
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below.					Final printed labels in repsonse to Agency letter dated "Me Too" Application. Other - Explain below.					
Inital application to register This application is being sub and a fee of \$4,360.	This application is being submitted under the PRIA II Fee for Service program as a EPA Class # R310 application with a 6 month review time									
<u> </u>				Sect	ion - III					
1. Material This Product Wi	l Be P	ackaged In:	 			-				
Child-Resistant Packaging Yes No Certification must	If "	t Packaging Yes No Yes" t Packaging wgt.	No. per container		•					
be submitted 3. Location of Net Contents				etail Contair			5. Lo	cation of La	bel Directi	ons
Container 6. Manner in Which Label is Affixed to Product Paper Stencil				250 ograph or glued ociled	graph Other Other					to container
				Secti	ion - IV					
1. Contact Point (Complete	items	directly below f	or identificat	tion of indivi	dual to be	contacted, i	if nec	essary, to p	rocess this	s application.)
Name Morris Gaskins			Title Registra	1		ĺ	hone No. (Include Area Code)			
Certification I certify that the statements I have made on this form and all a I acknowledge that any knowlingly false or misleading statem both under applicable law.				nd all attachi	all attachments thereto are true, accurate and complete.					6. Date Application Recuived (Stamped)
2. Signature	7.	8/2	10	3. Title Registrations Manager						
4. Typed Name	1			5. Date						
Morris Gaskins				April	14, 200	8				



TRANSMITTAL DOCUMENT

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Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604-2127

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Telephone: (229) 244-3288

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for registration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.

Do not send the completed form to this address.

Do not send the completed form to this address.								
Certification with Respect to Citation of Data								
Applicant's/Registrant's Name, Address, and Telephone Number Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604		EPA Registration Number/File Symbol 42750-appl						
Active Ingredient(s) and/or representative test compound(s) triclopyr acid	Date 4/11/08							
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) terrestrial food use, terrestrial non-food use		Product Name Triclopyr TGAI III						
NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).								
I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).								
SECTION I: METHOD OF DATA SUPP	ORT (Check one m	ethod only)						
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose). I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).								
SECTION II: GENERAL C	OFFER TO PAY							
[Required if using the cite-all method or when using the cite-all option under the select I hereby offer and agree to pay compensation, to other persons, with regard to								
SECTION III: CERTI	FICATION							
I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.								
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, tha	at I am the original data submitter or that I have obtained						
! certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the c.igi.ial data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to de:ermine the amount and terms of compensation, if any, to be paid for the use of the study.								
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.								
I certify that the statements I have made on this form and all attachme knowingly false or misleading statement may be punishable by fine or imprisor								
Signature MR 12-12	Date April 14, 2008	Typed or Printed Name and Title Morris Gaskins Registrations Manager						

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.

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·	DATA MATRIX		
Date: 4/14/08		EPA Reg. No./File Symbol 42750-appl	Page 1 of 6
Applicant's/Registrant's Name & Address:	Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021	Product: TRICLOPYR TGAI III	

Ingredient: Triclopyr acid CAS # 55335-06-3

Guideline Reference	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	With application	Albaugh	OWN	
830.1600	Description of Materials Used to Produce the	With application	Albaugh	OWN	
830.1620	Description of Product Process	With application	Albaugh	OWN	
830.1650	Description of Formulation Process				Waiver ²
830.1670	Description of Formation of Impurities	With application	Albaugh	OWN	
830.1700	Preliminary Analysis	With application	Albaugh	OWN	
830.1750	Certified Limits	With application	Albaugh	OWN	
830.1800	Enforcement Analytical Method	With application	Albaugh	OWN	
830.6302	Color	46619504	Albaugh	OWN	
830.6303	Physical State	46619504	Albaugh	OWN	
830.6304	Odor	46619504	Albaugh	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	46619504	Albaugh	OWN	
830.6314	Oxidation/Reduction: Chemical Incompatibility				Not req'd1
830.6315	Flammability				Not req'd1
830.6316	Explodability				Not req'd1
830.6317	Storage Stability				Not req'd1
Signature	Mrs Ho		Name and Title: Morr Regis	is Gaskins strations Manager	Date: 4/14/08

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	DATA MA	TRIX	
Date:		EPA Reg. No./File Symbol 42750-appl	Page 2 of 6
Applicant's/Registrant's Name & Address:	Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021	Product: TRICLOPYR TGAI III	

Ingredient: Triclopyr acid CAS # 55335-06-3

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6319	Miscibility				Not req'd1
830.6320	Corrosion Characteristics				Not req'd1
830.6321	Dielectric Breakdown Voltage				Not req'd1
830.7000	pH	46619504	Albaugh	OWN	
830.7050	UV/Visible Absorption	46619504	Albaugh	OWN	
830.7100	Viscosity				Not req'd1
830.7200	Melting Point/Melting Range	46619504	Albaugh	OWN	
830.7220	Boiling Point/Boiling Range				Waiver ³
830.7300	Density/Relative Density/Bulk Density	46619504	Albaugh	OWN	
830.7370	Dissociation Constants in Water	46619504	Albaugh	OWN	
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	46619506	Albaugh	OWN	
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Waiver ⁴
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Waiver ⁴
Signature	·	App	Name and Title: Morris Ga Registrat	askins cions Manager	Date: 4/14/08

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Page 3 of 6

42750-appl

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DATA MATRIX

Albaugh Inc.

EPA Reg. No./File Symbol

Product:

Date:

Applicant's/Registrant's Name & Address:

	121 NE 18 th St. Ankeny, IA_50021		TRICLOPYR	TGAI III	
Ingredient: Triclopyr acid CA		·			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	46619504	Albaugh	OWN	
330.7860	Water Solubility, Generator Column Method				Waiver ⁵
830.7950	Vapor Pressure	46619505	Albaugh	OWN	
870.1100	Acute Oral Toxicity – Rat	CITE ALL		PAY	
370.1200	Acute Dermal Toxicity - Rat	CITE ALL		PAY	
870.1300	Acute Inhalation Toxicity - Rat	CITE ALL		PAY	
870.2400	Primary Eye Irritation - Rabbit	CITE ALL		PAY	
370.2500	Primary Dermal Irritation	CITE ALL		PAY	
870.2600	Dermal Sensitization	CITE ALL		PAY	
Signature		AM	Name and Title: Morris Ga	nskins ions Manager	Date: 4/14/08
EPA Form 8570-35 (9-97) Electron	nic and Paper versions available. Submit only paper versions	on.		Internal Use Copy	

Page 4 of 6

42750-appl

FDA Reg. No. /File Symbol

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DATA MATRIX

Date:			EPA Reg. No./File Symbol 42/	50-аррі	Page 4 or
Applicant's/Registrant's Name (Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021		Product: TRICLOPYR TGAI	III	
Ingredient: Triclopyr acid CAS	# 55335-06-3				
Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
Triclopyr Acid generic data r	equirements				
Albaugh will make offers-to-pay	to the following companies that appear on t	he current data submi	tters list for triclopyr acid.		
Triclopyr Generic Data	Cite-All		Nufarm Americas (228)	PAY	
Triclopyr Generic Data	Cite-All		Dow Chemical (464)	PAY	
Triclopyr Generic Data	Cite-All		DuPont (352)	PAY	
Triclopyr Generic Data	Cite-All		Nufarm (35935)	PAY	
Triclopyr Generic Data	Cite-All		BASF Sparks (51036)	PAY	
Triclopyr Generic Data	Cite-All		Dow Agroscience (62719)	PAY	
Triclopyr Generic Data	Cite-All		SDTF (66607)	PAY	
Triclopyr Generic Data	Cite-All		Sepro Corp (67690)	PAY	
Triclopyr Generic Data	Cite-All		Repar Corp (69361)	PAY	
Triclopyr Generic Data	Cite-All		ORETF (71754)	PAY	
Triclopyr Generic Data	Cite-All		Ag Re-entry TF (71755)	PAY	
Triclopyr Generic Data	Cite-All		Nations Ag II (72167)	PAY	
Triclopyr Generic Data	Cite-All		UPM Corp. (72680)	PAY	
Signature	<u></u>	De	Name and Title: Morris Gaskins Registrations Ma	anager	Date: 4/14/08
EDA E 0E70 2E (0.07) El1	I December 2011 Color it and common		A T		

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only paper version.

Date:

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Page 5 of 6

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DATA MATRIX

Date:

Applicant's/Registrant's Name 8	& Address: Albaugh Inc. 121 NE 18 th St. Ankeny, IA 50021		Product: TRICLOPYR TGAI III		
Ingredient: Triclopyr acid CAS				····	
Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
Triclopyr Generic Data	Cite-All		Endangered Species TF (73989)	PAY	
Triclopyr Generic Data	Cite-All		AHETF (75234)	PAY	
Triclopyr Generic Data	Cite-All		GESTF (84653)	PAY	
Signature		W.	Name and Title: Morris Gaskins Registrations Mana	ger	Date: 4/14/08
EPA Form 8570-35 (9-97) Electronic	and Paper versions available. Submit only pa	per version.	Agency Internal (Jse Copy	

Footnotes for TRICLOPYR TGAI III Data Matrix (page 6 of 6)

Footnote 1

- 830.6314 Oxidation/Reduction: chemical incompatibility
- 830.6315 Flammability
- 830.6316 Explodability
- 830.6317 Storage Stability
- 830.6319 Miscibility
- 830.6320 Corrosion Characteristics
- 830.6321 Dielectric Breakdown
- 830.7100 Viscosity

This data is not required for Technical Grade products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

Footnote 2

830.1650 Formulation Process

Albaugh requests a waiver for this data requirement. Triclopyr TGAI III product is not deliberately formulated. See Guideline 830.1620.

Footnote 3

830.7220 Boiling Point/Range

Albaugh requests a waiver for this data requirement. Triclopyr TGAI III is a solid.

Footnote 4

- 830.7560 Partition Coefficient, Generator Column Method
- 830.7560 Partition Coefficient, Liquid Chromatography Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7550 Shake Flask Method.

Footnote 5

830.7860 Water Solubility, Generator Column Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7840 Shake Flask Method.

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TRICLOPYR TGAI III

ACTIVE INGREDIENT:	
3,5,6-trichloro-2-pyridyloxyacetic acid	98.0%
INERT INGREDIENTS:	2.0%
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

EMERGENCY NUMBERS: Transportation or spill, call CHEMTREC 800-424-9300.

EPA Reg. No. 42750-xxx

EPA Est. No. Xxxxxx-xxx-xxx

NET CONTENTS:

Manufactured For: ALBAUGH, INC. ANKENY, IA 50021

PRECAUTIONARY STATEMENTS,

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Wear long-sleeved shirt and long pants, protective eyewear, socks, shoes, and gloves. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

NOTICE: Read the entire label. Use only according to label directions. Before buying or using this product, read WARRANTY LIMITATIONS AND DISCLAIMER elsewhere on this label.

AGRICULTURAL CHEMICAL - Do not ship or store with food, feeds, drugs or clothing

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may be used to manufacture products that:

- 1. Contain triclopyr butoxyethyl ester (BEE) for use on rangeland, permanent pastures, forestry, turf, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, fence rows, industrial sites and conservation reserve program (CRP) areas.
- 2. Contain triclopyr triethylanolamine (TEA) for use on rangeland, permanent pastures, forestry, turf, Christmas tree plantations, non-irrigation ditches, non-cropland, roadsides, rights-of-ways, rice, fencerows, industrial sites and conservation reserve program (CRP) areas.
- 3. Specific uses not listed on the MP label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such uses.

NOTE: Because of their properties and intended uses, formulations containing TRICLOPYR 98% TECHNICAL ACID may require precautionary labeling differing from that given on this label. Formulators should develop their own use and precautionary labeling based on the properties and intended uses of their own formulations and in accordance with all pertinent laws and regulations.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 28 F away from moisture.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes "cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

GENERAL: Consult Federal, state or local disposal authorities for approved alternative procedures.

WARRANTY LIMITATIONS AND DISCLAIMER

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TRICLOPYR TGAI III

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INERT INGREDIENTS:	
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN

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EPA Reg. No. 42750-xxx

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TRICLOPYR TGAI III

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INERT INGREDIENTS:	2.09
TOTAL:	100.09

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CAUTION

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Pages 115-116 Confidential Statement of Formula may be entitled to confidential treatment

42750-ROT

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